

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

MICHAEL J. IANNONE, JR.,)
and NICOLE A. JAMES, as)
plan participants, on behalf of the)
AUTOZONE, INC. 401(k) Plan,)
and on behalf of others similarly)
situated,)

Plaintiffs,)

v.)

AUTOZONE, INC., as plan sponsor,)
BILL GILES, BRIAN CAMPBELL,)
STEVE BEUSSINK, KRISTIN)
WRIGHT, MICHAEL WOMACK,)
KEVIN WILLIAMS, and RICK SMITH,)
individually and as members of the)
AUTOZONE, Inc. Investment)
Committee, and NORTHERN)
TRUST CORPORATION and)
NORTHERN TRUST, INC., as)
investment fiduciaries,)

Defendants.)

CLASS ACTION

Case No.: 2:19-cv-02779-MSN-tmp

**UNOPPOSED MOTION FOR AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES
AND INCENTIVE AWARDS**

Pursuant to the Court's Order Granting Motion for Preliminary Approval of Class Settlement (Dkt. 437), Michael J. Iannone, Jr. and Nicole A. James ("Plaintiffs" and "Class Representatives"), as representatives of a class of participants in the AutoZone, Inc. 401(k) Plan (the "Plan"), together with Class Counsel Wiggins Childs Pantazis Fisher Goldfarb, LLC, James White Firm, LLC,

and Lange Clark, P.C. (collectively “Movants”) respectfully submit this Unopposed Motion for Award of Attorneys’ Fees, Reimbursement of Expenses, and Incentive Awards. The motion is based upon (i) the moving papers; (ii) the supporting memorandum (“Memorandum”); (iii) the Declarations of D.G. Pantazis, Jr., James H. White IV, and Lange Clark, attached thereto as Exhibits A, B, and C, respectively; (iv) the Declaration of Frank L. Watson, III, attached thereto as Exhibit D; (v) the Court filings of record, including the related motions for preliminary and final approval of the settlement with Defendants Northern Trust Corporation and Northern Trust, Inc. (“Northern Trust”); (vi) all other matters brought before the Court; and, (vii) for good cause shown. In support of this motion, Movants state as follows:

1. Movants request an award of attorneys’ fees award of \$833,333.33, one-third of \$2.5 million gross settlement amount.
2. Movants also request reimbursement of their actual out-of-pocket litigation costs totaling \$435,956.42.
3. Additionally, Movants request an incentive award of \$10,000.00 each (a total of \$20,000) for Class Representatives Michael Iannone and Nik James.
4. Each of these requests are due to be granted for the reasons set forth in the Memorandum and supporting documentation.

Based on the foregoing, Movants respectfully requests that that Class Counsel be awarded payment of attorneys’ fees of one-third of the gross \$2.5 million settlement amount (\$833,333.33), that Class Counsel be reimbursed for litigation

expenses totaling \$435,956.42, and that incentive awards of \$10,000.00 (\$20,000 total) be paid to each Class Representative, all in accordance with the terms of the Settlement Agreement.

RESPECTFULLY SUBMITTED,

/s/ D G. Pantazis, Jr.

D. G. Pantazis

Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2024, the above and foregoing document was filed and served via the Court's CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

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