

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**KEVIN MERRELL**, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

**1<sup>ST</sup> LAKE PROPERTIES, INC.,**

Defendant.

**CIVIL ACTION NO. 23-1450-SSV-  
DPC**

**PLAINTIFF’S MOTION FOR  
ATTORNEY’S FEES, COSTS, AND  
SERVICE AWARD**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support Plaintiff’s Motion for Attorney’s Fees, Costs, and Service Awards, the Declaration of Raina C. Borrelli in Support of Plaintiff’s Motion for Attorney’s Fees, Costs, and Service Award, the Declaration of Kevin Merrell in Support of Plaintiff’s Motion for Attorney’s Fees, Costs, and Service Award, and all prior pleadings and proceedings had herein, Plaintiff Kevin Merrell, individually and on behalf of the putative class, (“Plaintiff”) moves for an Order awarding: (1) attorneys’ fees of \$174,983.50, expenses in the amount of \$10,410.64, a service award to the Class Representative in the amount of \$5,000; and (2) granting such other relief and further relief as the Court deems just and proper.

Dated: August 6, 2025

Respectfully submitted,

*By: /s/ Layne C. Hilton*

Layne C. Hilton  
MEYER WILSON CO., LPA  
900 Camp Street Suite 337  
New Orleans, LA 70130

Telephone: (614) 255-2697  
lhilton@meyerwilson.com

Raina C. Borrelli (*pro hac vice*)  
STRAUSS BORRELLI PLLC  
One Magnificent Mile  
980 N. Michigan Avenue, Suite 1610  
Chicago, IL, 60611  
Telephone: (872) 263-1100  
Facsimile: (872) 263-1109  
raina@straussborrelli.com

*Attorneys for Plaintiff and the Proposed Class*