

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARIA TAPIA-RENDON, individually and  
on behalf of all others similarly situated,

*Plaintiff,*

v.

WORKEASY SOFTWARE, LLC,

*Defendant.*

Case No. 1:21-cv-3400

Judge: Hon. Matthew F. Kennelly

Magistrate: Hon. Beth W. Jantz

**PLAINTIFF'S MOTION FOR  
ATTORNEYS' FEES, EXPENSES, AND INCENTIVE AWARD**

Plaintiff Maria Tapia-Rendon respectfully moves this Court under Fed. R. Civ. P. 23(h) for an order approving payment of attorneys' fees, expenses, and an incentive award from the common settlement fund. Specifically, Plaintiff seeks attorneys' fees of \$494,406.33, expenses of \$221,080.69, and an incentive award of \$10,000, to be paid from the common fund during the course of settlement administration, as detailed in Plaintiff's accompanying memorandum. Plaintiff's motion is based on her supporting memorandum of points and authorities, and the declarations of J. Dominick Larry and Thomas R. Kayes, all filed contemporaneously herewith.

WHEREFORE, Plaintiff Maria Tapia-Rendon respectfully requests that the Court enter an order: (1) awarding Class Counsel attorneys' fees of \$494,406.33, to be paid from the settlement fund incrementally during administration of the settlement; (2) awarding Class Counsel expenses of \$221,080.69, to be paid from the settlement fund; (3) awarding Plaintiff an incentive award of \$10,000, to be paid incrementally from the settlement fund; and (4) granting such other and further relief as the Court deems reasonable and just.

Dated: February 11, 2026

Respectfully submitted,

**MARIA TAPIA-RENDON**, individually  
and on behalf of all others similarly situated,

s/ J. Dominick Larry

One of Plaintiff's Attorneys

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