

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ANDE KYLES and DIANE TAYLOR, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

STEIN MART , INC., a Florida corporation,

and

SOCIAL ANNEX, INC. (d/b/a, ANNEX
CLOUD), a Delaware corporation,

Defendants.

CASE NO. 1:19-cv-00483-CFC

CLASS ACTION

JURY TRIAL DEMANDED

**PLAINTIFFS' UNOPPOSED MOTION FOR
ATTORNEYS' FEES, EXPENSES AND INCENTIVE AWARDS**

PLEASE TAKE NOTICE that at the Final Approval Hearing scheduled for August 19, 2020 at 2:30 p.m., Plaintiffs will move the Court to enter the Proposed Order filed contemporaneously herewith granting the instant Plaintiffs Unopposed Motion for Attorneys' Fees, Expenses and Incentive Awards, and approving (1) the payment of \$300,000 to Plaintiffs' Counsel for their attorneys' fees and reimbursement of expenses, and (2) the payment of incentive awards in the amount of \$2,500 each for Plaintiffs Ande Kyles and Diane Taylor.

PLEASE FURTHER NOTE that Plaintiffs will rely on the Brief, Declarations of Counsel, and other related materials in support of this motion, filed contemporaneously herewith.

PLEASE FURTHER NOTE that Defendants do not oppose this motion.

Dated: June 25, 2020

Respectfully submitted,

/s/ Tiffany J. Cramer

Tiffany J. Cramer (Del. Bar No. 4998)
CHIMICLES SCHWARTZ KRINER
& DONALDSON-SMITH LLP
2711 Centerville Road, Suite 201
Wilmington, DE 19801
(302) 656-2500
tjc@chimicles.com

Benjamin F. Johns (*admitted pro hac vice*)
Mark B. DeSanto (*admitted pro hac vice*)
CHIMICLES SCHWARTZ KRINER
& DONALDSON-SMITH LLP
One Haverford Centre
361 Lancaster Avenue
Haverford, PA 19041
(610) 642-8500
bfj@chimicles.com
mbd@chimicles.com

Cornelius P. Dukelow (*admitted pro hac vice*)
Oklahoma Bar No. 19086
Abington Cole + Ellery
320 South Boston Avenue, Suite 1130
Tulsa, Oklahoma 74103
918.588.3400 (*telephone & facsimile*)
cdukelow@abingtonlaw.com
www.abingtonlaw.com

Counsel for Plaintiffs and the Putative Class