

UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

BRIAN PURNELL, *individually and
on behalf of all others similarly situated*,

Plaintiff,

vs.

SUMMIT NATIONAL BANK,

Defendant.

Case No. 2:24-cv-00190-KHR

**PLAINTIFF’S MOTION FOR ATTORNEYS’ FEES,
EXPENSES, AND CLASS REPRESENTATIVE SERVICE AWARD**

Under Federal Rules of Civil Procedure 23(h) and 54(d), and this Court’s October 20 25, 2025 Order Granting Preliminary Approval of Class Action Settlement (“Preliminary Approval Order”) (ECF No. 38), Plaintiff Brian Purnell (“Plaintiff” or “Class Representative”) respectfully submits this Motion for: (1) approval of an award of attorneys’ fees to Class Counsel in the amount of \$133,333.33 (one-third of the Settlement Fund); (2) approval of reimbursement of reasonable litigation expenses of \$2,506.44; and (3) approval of a service award of \$4,000.00 to the Class Representative. Plaintiff’s arguments in support of these three requests are set forth in their Memorandum in support of this Motion, which is being filed contemporaneously with this Motion.

Plaintiff has consulted with Defendant before filing this motion and determined that Defendant does not oppose Plaintiff’s motion.

Dated: January 6, 2026

Respectfully submitted,

/s/ Terence R. Coates

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Jonathan T. Deters (*pro hac vice*)

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*Counsel for Plaintiff
and the Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2026, I served the foregoing upon counsel for all parties by filing it with the Court's electronic-filing system, in accordance with Fed. R. Civ. P. 5(b)(2)(E).

/s/ Terence R. Coates
Terence R. Coates (0085579)