

1 MORGAN & MORGAN  
COMPLEX LITIGATION GROUP  
2 John A. Yanchunis (Admitted *Pro Hac Vice*)  
201 N. Franklin Street, 7th Floor  
3 Tampa, FL 33602  
4 Telephone: 813/223-5505  
jyanchunis@ForThePeople.com

TADLER LAW LLP  
Ariana J. Tadler (Admitted *Pro Hac Vice*)  
One Pennsylvania Plaza, 36th Floor  
New York, NY 10119  
Telephone: 212/946-9300  
atadler@tadlerlaw.com

5 ROBBINS GELLER RUDMAN  
& DOWD LLP  
6 Stuart A. Davidson (Admitted *Pro Hac Vice*)  
120 East Palmetto Park Road, Suite 500  
7 Boca Raton, FL 33432  
8 Telephone: 561/750-3000  
sdavidson@rgrdlaw.com

LOCKRIDGE GRINDAL NAUEN P.L.L.P.  
Karen Hanson Riebel (Admitted *Pro Hac Vice*)  
100 Washington Ave. South, Suite 2200  
Minneapolis, MN 55401  
Telephone: 612/339-6900  
khriebel@locklaw.com

9 CASEY GERRY SCHENK FRANCAVILLA  
10 BLATT & PENFIELD LLP  
Gayle M. Blatt (122048)  
11 110 Laurel Street  
12 San Diego, CA 92101  
Telephone: 619/238-1811  
13 gmb@cglaw.com

ROBINSON CALCAGNIE, INC.  
Daniel S. Robinson (244245)  
19 Corporate Plaza Dr.  
Newport Beach, CA 92660  
Telephone: 949/720-1288  
949/720-1292  
drobinson@robinsonfirm.com

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15 *Attorneys for Plaintiffs and Settlement Class Counsel*

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17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION**

19 IN RE: YAHOO! INC. CUSTOMER DATA )  
SECURITY BREACH LITIGATION )

No. 16-md-02752-LHK

20 **PLAINTIFFS' MOTION FOR**  
21 **ATTORNEYS' FEES, COSTS, AND**  
22 **EXPENSES AND SERVICE AWARDS**

23 ) Date: April 2, 2020

24 ) Time: 1:30 p.m.

25 ) Courtroom: 8, 4th Floor

26 ) Judge: Hon. Lucy H. Koh  
27 )  
28 )

1 PLEASE TAKE NOTICE THAT Plaintiffs move the Court to grant Plaintiffs' Motion for  
2 Attorneys' Fees, Costs, and Expenses and Service Awards.

3 Plaintiffs respectfully request that the Court grant Plaintiffs' Motion for Attorneys' Fees,  
4 Costs, and Expenses and Service Awards, and that the Court enter an Order that:

- 5 (1) Awards Settlement Class Counsel \$30,000,000 in reasonable attorneys' fees for  
6 Settlement Class Counsel's efforts in litigating this action and obtaining the  
7 benefits for the Settlement Class afforded by the Settlement;
- 8 (2) Awards Settlement Class Counsel \$1,497,609.54 (\$1,341,230.41 for MDL  
9 Counsel and \$156,379.13 for JCCP Counsel) in litigation costs and expenses  
10 reasonably expended, plus a \$60,000 reserve for expert costs to monitor  
11 compliance with the settlement;
- 12 (3) Awards Service Awards of \$7,500, \$5,000, and \$2,500 per Settlement Class  
13 Representative, as determined by their involvement as described in the  
14 memorandum in support of this motion;
- 15 (4) Overrules all objections regarding the foregoing requests; and  
16 (5) Grants further relief as the Court deems just and proper.

17 This Motion is supported by the memorandum filed in support and the exhibits  
18 referenced therein.

19 Respectfully submitted,

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21 MORGAN & MORGAN  
22 COMPLEX LITIGATION GROUP  
23 John A. Yanchunis

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25 /s/ John A. Yanchunis  
26 John A. Yanchunis

27 201 N. Franklin Street, 7th Floor  
28 Tampa, FL 33602  
Telephone: 813/223-5505  
813/223-5402 (fax)

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& DOWD LLP  
Stuart A. Davidson (Admitted *Pro Hac Vice*)  
120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
Telephone: 561/750-3000  
561/750-3364 (fax)  
sdavidson@rgrdlaw.com

CASEY GERRY SCHENK FRANCAVILLA  
BLATT & PENFIELD LLP  
Gayle M. Blatt (122048)  
110 Laurel Street  
San Diego, CA 92101  
Telephone: 619/238-1811  
619/544-9232 (fax)

TADLER LAW LLP  
Ariana J. Tadler (Admitted *Pro Hac Vice*)  
One Pennsylvania Plaza, 19th Floor  
New York, NY 10119  
Telephone: 212/946-9300  
atadler@tadlerlaw.com

LOCKRIDGE GRINDAL NAUEN P.L.L.P.  
Karen Hanson Riebel (Admitted *Pro Hac Vice*)  
100 Washington Ave. South, Suite 2200  
Minneapolis, MN 55401  
Telephone: 612/339-6900  
612/339-0981 (fax)

ROBINSON CALCAGNIE, INC.  
Daniel S. Robinson (244245)  
19 Corporate Plaza Dr.  
Newport Beach, CA 92660  
Telephone: 949/720-1288  
949/720-1292  
drobinson@robinsonfirm.com

*Attorneys for Plaintiffs and Settlement Class  
Counsel*

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CERTIFICATE OF SERVICE

I hereby certify that January 31, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed January 31, 2020.

/s/ John A. Yanchunis  
John A. Yanchunis  
MORGAN & MORGAN COMPLEX  
LITIGATION GROUP  
201 N. Franklin Street,  
7th Floor Tampa, FL 33602  
Telephone: 813/223-5505  
813/223-5402 (fax)