

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS**

SHANA GUDGEL and CRAIG WOOLARD,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

REYNOLDS CONSUMER PRODUCTS  
INC. and REYNOLDS CONSUMER  
PRODUCTS LLC,

Defendants.

Case No. 23LA00000486

**NOTICE OF MOTION AND MOTION OF THE CLASS REPRESENTATIVES AND  
CLASS COUNSEL FOR AN ORDER GRANTING PAYMENT OF  
ATTORNEYS' FEES AND COSTS TO THE CLASS REPRESENTATIVES' COUNSEL;  
PAYMENT OF SERVICE AWARDS TO THE CLASS REPRESENTATIVES; AND  
PAYMENT OF THE CLAIMS ADMINISTRATOR'S COSTS**

COMES NOW Class Representatives Shana Gudgel and Craig Woolard, through their undersigned counsel, who will move at the hearing before this Court set for 9:00 a.m. on November 15, 2023 for an order that grants:

1. Payment of \$975,000 to Class Counsel for their fees and costs;
2. Payment of Service Awards of \$5,000 each to Plaintiffs Gudgel and Woolard; and
3. Payment of the costs of the Claims Administrator.

This Notice of Motion and Motion is based on: the accompanying Memorandum in Support ("Memorandum"); the Declaration of Michael Reese dated October 11, 2023 and filed simultaneously with the Memorandum; the Declaration of William Wright dated October 11, 2023 and filed simultaneously with the Memorandum; The Declaration of Cameron Azari, Esq. of Epiq Class Action and Claims Solutions, Inc. Regarding Implementation and Adequacy of Notice Plan

dated October 10, 2023 and filed simultaneously with the Memorandum; the Settlement Agreement previously filed with the Court on August 18, 2023; the Court's Order Granting Preliminary Approval of Class Action Settlement entered by the Court on August 30, 2023; the records, pleadings, and papers filed in this action; and upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

DATED: October 11, 2023

Respectfully Submitted,

*s/ Gary M. Klinger*

Gary M. Klinger (6303726)

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