

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

DURWIN HAMPTON, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 6:21-CV-250-GLJ

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

Plaintiff Durwin Hampton (“Plaintiff”), by and through his counsel, hereby respectfully requests that the Court, pursuant to Federal Rule of Civil Procedure 23, enter an order awarding Class Counsel \$9,436,540 in attorneys’ fees and expenses and awarding a service award of \$15,000 to Plaintiff Hampton.

Plaintiff respectfully requests the Court set a hearing on the Motion on September 15, 2025 at 11:00 am, in the United States District Court, Eastern District of Oklahoma, before Magistrate Judge Gerald L. Jackson.

Plaintiff brings this motion on the grounds that: (a) the requested award of attorneys’ fees and expenses is reasonable when considered under the factors set forth in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974); (b) the expenses incurred by Class Counsel in this litigation were reasonable and should be reimbursed; and (c) the requested service award is reasonable in light of Plaintiff’s service in representing the Class.

In support of this Motion, Plaintiff submits the contemporaneously-filed Memorandum of Points and Authorities and the accompanying Joint Declaration of Class Counsel.

Dated: June 23, 2025

Respectfully submitted,

/s/ H. Clay Barnett, III

H. Clay Barnett III (*pro hac vice*)

W. Daniel “Dee” Miles III (*pro hac vice*)

J. Mitch Williams (*pro hac vice*)

**BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.**

272 Commerce Street

Montgomery, Al 36104

Phone: 334-269-2343

dee.miles@beasleyallen.com

clay.barnett@beasleyallen.com

mitch.williams@beasleyallen.com

Adam J. Levitt (*pro hac vice*)

John E. Tangren (*pro hac vice*)

Daniel R. Ferri (*pro hac vice*)

DICELLO LEVITT LLP

Ten North Dearborn Street, Sixth Floor

Chicago, Illinois 60602

Phone: 312-214-7900

alevitt@dicellolevitt.com

jtangren@dicellolevitt.com

dferri@dicellolevitt.com

Evan M. McLemore, OBA No. 31407

LEVINSON, SMITH & HUFFMAN, PC

1743 East 71st Street

Tulsa, OK

Phone: 918-492-4433

evan.mclemore@lsh-law-firm.com

Attorneys for Plaintiff and the Class