

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

FILED IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
2021 MAR 29 PM 3:54 CASE NO. 21-CVS-534  
WAKE COUNTY, N.C.

BEAU ZANCA; ERIC KROHM; A.J., by  
and through his Guardian CHRIS JONES;  
Z.K., by and through his Guardian SEAN  
KINNEY; M.M., by and through his  
Guardian DAVID MINCES; L.M., by and  
through his Guardian CHAD MOYER;  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

EPIC GAMES, INC., a Maryland  
corporation,

Defendant.

BIB

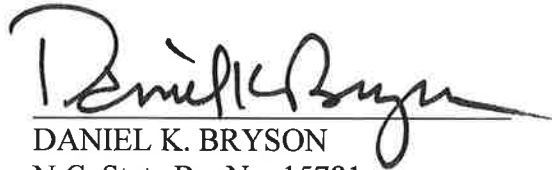
**MOTION FOR AWARD OF ATTORNEYS'  
FEES, EXPENSES, AND SERVICE  
AWARDS**

Plaintiffs Beau Zanca; Eric Krohm; A.J., by and through his Guardian Chris Jones; Z.K., by and through his Guardian Sean Kinney; M.M., by and through his Guardian David Mince; and L.M., by and through his Guardian Chad Moyer (hereinafter "Plaintiffs"), pursuant to the Court's Preliminary Approval Order signed on February 25, 2021, the common fund doctrine, *Horner v. Chamber of Commerce*, 236 N.C. 96, 97-98 (1952), and the percentage of the recovery method respectfully move the Court for an order awarding attorneys' fees and expenses in the amount of \$11,300,000.00, and service awards totaling \$75,000.00, and providing such other and further relief as the Court deems just and proper.

In further support, Plaintiffs will submit a memorandum of law and other materials in support of this Motion pursuant to the North Carolina Rules of Civil Procedure or as otherwise directed by the Court, as well as such other written or oral arguments as permitted by the Court.

Respectfully submitted on this 29th day of March, 2021.

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**CERTIFICATE OF SERVICE**

I, Daniel K. Bryson, of Whitfield Bryson LLP, attorney for Plaintiff, do hereby certify that I have served a copy of the forgoing document filed on March 29, 2021 upon the attorneys of record in this action in accordance to Rule 5 of the North Carolina Rules of Civil Procedure via USPS addressed as follows:

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This the 29<sup>th</sup> day of March 2021.

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