

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

**JOHN PRIDDY, RANDY MCGILBERRY,
TIMOTHY JEMISON, NATHANIEL
GERTH, GARY BECKER, AMINE M.
BENDRISS, BARBARA BROWN, DAVID
PACHOLCZAK, PATRICIA
MCMAHON, and EVAN WEESE, on
behalf of themselves and others similarly
situated,**

Plaintiffs,

v.

ZOLL MEDICAL CORPORATION,

Defendant.

Case No. 1:23-cv-10575-IT

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT
OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVES
SERVICE AWARDS**

Plaintiffs John Priddy, Randy McGilberry Timothy Jemison, Nathaniel Gerth, Gary Becker, Amine M. Bendriss, Barbara Brown, David Pacholczak, Patricia McMahon, and Evan Weese (collectively, “Plaintiffs”), will and hereby do move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for the entry of an Order:

1. Approving Plaintiffs’ request for attorneys’ fees in the amount of \$1,166,666.67, and directing payment of the same to Settlement Class Counsel, Jean S. Martin, within the time frame specified in any order granting Final Approval of the Settlement Agreement filed by the parties on April 23, 2026;

2. Approving Plaintiffs’ request for expenses payable in the amount of \$41,204.41 and directing payment of the same from the Settlement Fund to Class Counsel, Jean S. Martin, within the time frame specified in any order granting Final Approval of the Settlement Agreement filed by the parties on April 23, 2026;

3. Approving Plaintiffs’ request for service awards in the amount of \$1,500 for each of the Settlement Class Representatives, namely John Priddy, Randy McGilberry, Timothy Jemison, Nathaniel Gerth, Gary Becker, Amine M. Bendriss, Barbara Brown, David Pacholczak, Patricia McMahon, Evan Weese, and directing payment of the same to Class Counsel, Jean S. Martin, within the time frame specified in any order granting Final Approval of the Settlement Agreement filed by the parties on April 23, 2026.

The grounds for this motion are that the amounts requested for attorneys’ fees, reimbursement of litigation expenses, and service awards for class representatives, are all within the range of reasonableness, as detailed in Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Motion for Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards, as well as the Declaration of Jean S. Martin filed herewith, the pleadings and

papers on file in this action, and such oral argument and documentary evidence as may be presented at the hearing on this motion.

Dated: July 20, 2026

Respectfully Submitted,

/s/ Jean Martin

Jean S. Martin (N.C. Bar No. 25703)
**AYLSTOCK, WITKIN, KREIS &
OVERHOLTZ PLC**

17 East Main Street, #200

Pensacola, Florida 32502

Telephone: (850) 266-2893

Facsimile: (850) 916-7449

Email: jmartin@awkolaw.com

NOTICE OF COMPLIANCE WITH L.R. 7-1

Plaintiffs hereby certify that in compliance with Local Rule 7.1, this motion is presented to the Court pursuant to and in compliance with the agreement between Plaintiffs and Defendant ZOLL as memorialized in the Settlement Agreement, Doc. No. 72 at 25-26, ¶¶ 7.1 – 7.3.

/s/ Jean Martin

Jean S. Martin