

**IN THE CIRCUIT COURT OF PHELPS COUNTY, MISSOURI**

MOLLY BECKER, SONJA BOLERJACK,  
FRANK GONZALEZ, VINCENT LEBRECHT,  
MARIA MCBAIN, VICTORIA RODGERS,  
PAMELA SMYTHE, and ROBIN WHITE,  
individually and on behalf of all  
others similarly situated,

Case No. 20PH-CV00569

Plaintiffs,

v.

MASSIMO ZANETTI BEVERAGE, USA, Inc.,  
a Delaware corporation, MOTHER PARKERS  
TEA & COFFEE USA, Ltd., a Texas limited  
partnership, and REILY FOODS COMPANY, a  
Delaware corporation,

Defendants.

**UNOPPOSED MOTION FOR ATTORNEYS' FEES, COSTS, AND CLASS  
REPRESENTATIVE INCENTIVE AWARDS**

Plaintiffs Molly Becker, Sonja Bolerjack, Frank Gonzalez, Vincent Lebrecht, Maria McBain, Victoria Rodgers, Pamela Smythe, and Robin White, (together, "Plaintiffs") respectfully submit this Unopposed Motion for Attorneys' Fees, Costs, and Class Representative Awards ("Motion"). This Motion is based on the Memorandum in Support and the Declaration of Scott A. Kamber, filed herewith. As set forth in detail in the Memorandum and pursuant to the terms of the Class Action Settlement Agreement reached in the above-captioned case, Plaintiffs respectfully request that the Court award attorneys' fees and costs to Class Counsel in the amount of \$4,700,000 and Class Representative Service Awards in the total amount of \$27,000 .

Dated this 19th day of October, 2020.

Molly Becker, Sonja Bolerjack, Frank Gonzalez, Vincent Lebrecht, Maria Mcbain, Victoria Rodgers, Pamela Smythe, and Robin White, Individually, and on Behalf of Classes of Similarly Situated Individuals, Plaintiffs

By: /s/ Scott A. Kamber  
Scott A. Kamber, #70534MO  
skamber@kamberlaw.com  
KAMBERLAW LLC  
201 Milwaukee Street, Suite 200  
Denver, CO 80206  
Tel: (303) 222-9008  
Fax: (212) 202-6364

David L. Steelman, #27334MO  
dstelman@steelmanandgaunt.com  
Stephen F. Gaunt, #33183MO  
sgaunt@steelmanandgaunt.com  
STEELMAN & GAUNT  
901 Pine Street, Suite 110  
Rolla, Missouri 65401  
Tel: (573) 458-5231  
Fax: (573) 341-8548

L. DeWayne Layfield (admitted by *PHV*)  
dewayne@layfieldlaw.com  
LAW OFFICE OF L. DEWAYNE LAYFIELD, PLLC  
P.O. Box 3829  
Beaumont, TX, 77704  
Tel: (409) 832-1891  
Fax: (866) 280-3004

Gillian Leigh Wade (admitted by *PHV*)  
gwade@mjfwlaw.com  
MILSTEIN JACKSON FAIRCHILD & WADE, L.L.P.  
10250 Constellation Blvd., Floor 14,  
Los Angeles, CA 90067  
Tel: (310) 396-9600  
Fax: (310) 396-9635

Lydia Sturgis Zbrzezny (admitted by *PHV*)  
lydia@southernatlanticlaw.com  
SOUTHERN ATLANTIC LAW GROUP, PLLC  
99 6<sup>th</sup> Street SW  
Winter Haven, FL 33880  
Tel: (863) 656-6672  
Fax: (863) 301-4500

Nicholas T. Zbrzezny (admitted by *PHV*)  
nick@southernatlanticlaw.com  
SOUTHERN ATLANTIC LAW GROUP, PLLC  
99 6<sup>th</sup> Street SW  
Winter Haven, FL 33880  
Tel: (863) 656-6672  
Fax: (863) 301-4500

Howard W. Rubinstein (admitted by *PHV*)  
The Law Office of Howard W. Rubinstein  
1281 N. Ocean Dr. Apt. 198  
Singer Island, FL 33404  
Telephone: 832-715-2788  
Fax: 561-688-0630  
Email: howardr@pdq.net

*Attorneys for Plaintiffs and the Putative Class*