

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS  
AT TOPEKA

JIN NAKAMURA,  
individually and on behalf of all others  
similarly situated,

Plaintiff,

v.

WELLS FARGO BANK,  
NATIONAL ASSOCIATION  
d/b/a WELLS FARGO DEALER  
SERVICES, INC.,

Defendant.

Case No. 5:17-cv-04029-DDC-GEB

Fairness Hearing: **May 15, 2019 at 9:00 a.m.**

**CLASS REPRESENTATIVE'S MOTION FOR APPROVAL OF  
CLASS COUNSEL FEES AND EXPENSES**

Plaintiff, as Class Representative for the Settlement Class, respectfully moves this Court for entry of an Order approving the following, in accord with the parties' Settlement Agreement [Dkt. No. 127-1] and Section 14 of the Class Notice [Dkt. No. 127-1 at ECF 36]:

- (1) Class Counsel Fees in the amount of \$1,691,250, which represents one-third of the Settlement Amount (and 24.5% of the Total Recovery); and
- (2) Reimbursement of Class Counsel's litigation expenses in the amount of \$78,209.59.

Class Representative bases this Motion on: (1) the Memorandum of Law in Support of this Motion; (2) the Memorandum of Law in Support of Class Representative's Motion for Final Approval of Class Action Settlement and For Approval of Incentive Award; (3) the exhibits attached to the Combined Index of Exhibits submitted in support of both Motions; and (4) the

applicable law and all pleadings, declarations, and records on file in this matter, which are respectfully incorporated by reference as if set forth fully herein.

Respectfully submitted,

REX A. SHARP, P.A.

/s/ Rex A. Sharp  
Rex A. Sharp KS #51205  
Ryan C. Hudson KS #22986  
Scott B. Goodger KS #26480  
5301 W. 75th Street  
Prairie Village, KS 66208  
T: 913-901-0505  
F: 913-901-0419 Fax  
rsharp@midwest-law.com  
rhudson@midwest-law.com

Bryce B. Bell           KS#20866  
Mark W. Schmitz       KS#27538  
Bell Law, LLC  
2600 Grand Blvd., Suite 580  
Kansas City, Missouri 64108  
T: 816-886-8206  
F: 816-817-8500  
Bryce@BellLawKC.com

A. Scott Waddell       KS#20955  
Waddell Law Firm LLC  
2600 Grand Blvd., Suite 580  
Kansas City, Missouri 64108  
T: 816-914-5365  
F: 816-817-8500  
scott@aswlawfirm.com

**Settlement Class Counsel**

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing was filed using the Court's CM/ECF filing system, which automatically sends notice of filing to all attorneys of record, on April 1, 2019.

*/s/ Rex Sharp* \_\_\_\_\_  
Rex A. Sharp