

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY  
STATE OF MISSOURI**

---

MICHAEL PREGON, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

STATE FARM FIRE AND CASUALTY  
COMPANY,

Defendant.

---

Case No. 24SL-CC03130

---

**PLAINTIFF’S MOTION FOR AWARD OF ATTORNEYS’ FEES,  
COSTS, AND EXPENSES TO CLASS COUNSEL AND  
SERVICE AWARD TO CLASS REPRESENTATIVE**

---

Plaintiff Michael Pregon (“Plaintiff”) respectfully moves for an order granting the requested attorneys’ fees, costs, and litigation expenses to Class Counsel and the requested service award to Plaintiff as set forth below, and requests that such awards be made part of the Final Order and Judgment. See the proposed language in paragraph 15 of the Final Order and Judgment. Specifically, Plaintiff requests the following awards:

1. Attorneys’ fees, costs, and expenses to Class Counsel in the amount of \$5,125,000, which represents approximately 23.8% of the estimated total benefit made available to the Settlement Class and without any reduction in the payments to be made to Class Members; and
2. Service award in the amount of \$7,500 to Plaintiff as Class Representative for his service to the Settlement Class.

This Motion is based upon the parties’ Settlement and supporting documents, and the entire files and proceedings herein. For the reasons set forth in the accompanying Memorandum and

Declarations of Class Counsel, Plaintiff respectfully requests that the Court grant this Motion as prayed for herein.

February 23, 2026

*/s/Christopher E. Roberts*

David T. Butsch #37539

Christopher E. Roberts #61895

**BUTSCH ROBERTS & ASSOCIATES LLC**

7777 Bonhomme Avenue, Suite 1300

Clayton, MO 63105

Tel: (314) 863-5700

Fax: (314) 863-5711

[Butsch@ButschRoberts.com](mailto:Butsch@ButschRoberts.com)

[Roberts@ButschRoberts.com](mailto:Roberts@ButschRoberts.com)

Erik D. Peterson

**ERIK PETERSON LAW OFFICES, PSC**

110 W. Vine Street, Suite 300

Lexington, KY 40507

Tel: (800) 614-1957

[erik@eplo.law](mailto:erik@eplo.law)

J. Brandon McWherter

**MCWHERTER SCOTT & BOBBIT, PLC**

109 Westpark Drive, Suite 260

Brentwood, TN 37027

Tel: (615) 354-1144

[brandon@msb.law](mailto:brandon@msb.law)

T. Joseph Snodgrass

**SNODGRASS LAW LLC**

100 S. Fifth Street, Suite 800

Minneapolis, MN 55402

Tel: (612) 448-2600

[jsnodgrass@snodgrass-law.com](mailto:jsnodgrass@snodgrass-law.com)

Douglas J. Winters

**THE WINTERS LAW GROUP, LLC**

7700 Bonhomme Avenue, Suite 575

Clayton, MO 63105

Tel: (314) 499-5200

[dwinters@winterslg.com](mailto:d winters@winterslg.com)

*Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed and served via the Court's electronic filing system, which will send electronic notices of same to all counsel of record on this the 23<sup>rd</sup> day of February, 2026.

/s/Christopher E. Roberts