

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

WALTER BLACK III, KEITH BARR, WAYNE
BEST, and DAVID FANT SR., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

USAA GENERAL INDEMNITY COMPANY,
GARRISON PROPERTY AND CASUALTY
INSURANCE COMPANY, UNITED SERVICES
AUTOMOBILE ASSOCIATION, USAA
CASUALTY INSURANCE COMPANY,

Defendants.

Case No. 8:21-CV-01581-LKG

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES
AND COSTS AND SERVICE AWARDS**

PLEASE TAKE NOTICE that on April 28, 2026 at 10:00 A.M. at the United States District Court of the District of Maryland, Greenbelt Division, 6500 Cherrywood Lane, Suite 400, Greenbelt, MD 20770, before the Honorable Lydia Kay Griggsby, Plaintiffs Walter Black III, Keith Barr, Wayne Best, and David Fant Sr. will move this Court to award Plaintiffs' counsel attorneys' fees in the amount of \$1,897,980.94, comprising approximately 37% of the total settlement value or approximately 37.96% of the common fund, and reimbursement of costs in the amount of \$84,019.06. Additionally, Plaintiffs move for Service Awards of \$7,500.00 for Plaintiff Black and in the amount of \$3,500.00 for Plaintiffs Barr, Best, and Fant.

Plaintiffs' Memorandum of Law in support is filed herewith. Also supporting this motion are the declarations of Class Counsel, Andrea R. Gold of Tycko & Zavareei LLP,¹ Keith T. Vernon of Timoney Knox LLP, and Jonathan Kagan of Kagan Stern Marinello & Beard LLC, as well as the declarations of Plaintiffs' counsel, Karen Kohn of the Kohn Law Group, and Jonathan Shub of Shub Johns & Holbrook LLP. Finally, Plaintiffs are concurrently filing an Unopposed Motion for Final Approval of Class Action Settlement and a Proposed Order Granting Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plaintiffs' Motion for Attorneys' Fees and Costs, and Service Awards attached thereto as Exhibit 2 addressing the relief sought in this Motion.

Dated: March 16, 2026

Respectfully submitted,

/s/ Jonathan P. Kagan
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¹ Andrea R. Gold's Declaration in support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plaintiffs' Motion for Award of Attorneys' Fees and Costs and Service Awards is filed in connection with the Motion for Final Approval, filed concurrently herewith.

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*Admitted *pro hac vice*

Class Counsel for Plaintiffs and the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2026, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/Jonathan P. Kagan

Jonathan P. Kagan