

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>ANTHONY D. KOLTON, S. DAVID</b>	)	
<b>GOLDBERG, JEFFREY S. SCULLEY, and</b>	)	
<b>HENRY C. KRASNOW, individually and on</b>	)	
<b>behalf of classes of all others similarly situated,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
<b>v.</b>	)	<b>No. 16-cv-3792</b>
	)	<b>Hon. Charles P. Kocoras</b>
	)	
<b>MICHAEL W. FRERICHS,</b>	)	
<b>Treasurer of the State of Illinois,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFFS’ MOTION FOR  
AWARD OF ATTORNEYS’ FEES AND OTHER RELIEF**

Plaintiffs, by their attorneys, move this Court for the following:

1. An award of attorneys’ fees to Plaintiffs’ Counsel Terry Rose Saunders and Arthur T. Susman of \$9,500,000 inclusive of all costs and expenses payable from the Unclaimed Property Trust Fund maintained by the Illinois State Treasurer; and
2. An award of \$2,500 each pursuant to Paragraph 3.2.5 of the Settlement Agreement in this cause as Plaintiffs’ Compensation to the following:
  - a. Anthony D. Kolton;
  - b. The Sherwin David Goldberg Declaration of Trust;
  - c. Jeffery S. Sculley; and
  - d. Henry C. Krasnow.

Plaintiffs’ Memorandum in Support of their Motion is being filed with this Motion.

Respectfully submitted,

Dated: September 22, 2021

/s/ Terry Rose Saunders  
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*Counsel for Plaintiffs and the Rule 23(b)(2)  
Class and the Rule 23(b)(3) Settlement Class*