

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

PRESTON KYLES, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PAPA JOHN'S INTERNATIONAL, INC.,

Defendant.

Case No. 1:20-cv-07146

Judge: Hon. John Robert Blakey

**PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND INCENTIVE AWARD**

Plaintiff Preston Kyles respectfully moves this Court, pursuant to Fed. R. Civ. P. 23(h), for an order approving payment of attorneys' fees, expenses, and an incentive award from the common settlement fund. Specifically, Plaintiff seeks attorneys' fees of one-third of the net settlement fund (\$729,944), expenses of \$13,890.42, and an incentive award of \$10,000. Plaintiff's motion is based on his accompanying memorandum of points and authorities, and the declarations of J. Dominick Larry and Thomas R. Kayes, filed contemporaneously herewith.

WHEREFORE, Plaintiff Preston Kyles respectfully requests that the Court enter an order: (1) awarding Class Counsel attorneys' fees of \$729,944, to be paid from the settlement fund; (2) awarding Class Counsel expenses of \$13,890.42, to be paid from the settlement fund; (3) awarding Plaintiff an incentive award of \$10,000, to be paid from the settlement fund; and (4) granting such other and further relief as the Court deems reasonable and just.

Dated: April 3, 2026

Respectfully submitted,

PRESTON KYLES, individually and on
behalf of all others similarly situated,

s/ J. Dominick Larry

One of Plaintiff's Attorneys

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