

Docketed 11/24/2025

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss.

CONSTANTINE KOSSIFOS, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

SHIELDS HEALTH CARE GROUP, INC.,

Defendant.

SUPERIOR COURT
TRIAL COURT DEPARTMENT

CASE NO. 2282-cv-00561

CONSOLIDATED WITH:

ESSEX, ss.

AMANDA JOHNSON, CHRISTINE CAMBRIA,
COURTNEY HORGAN, and KENNETH
VANDAM, on behalf of himself and all others
similarly situated,

Plaintiff,

v.

SHIELDS HEALTH CARE GROUP, INC.,

Defendant.

SUPERIOR COURT
TRIAL COURT DEPARTMENT

CASE NO. 2277-cv-00839

NORFOLK, ss.

WILLIAM BISCAN, TENNIE KOMAR, and
LISA SMITH, on behalf of himself and all others
similarly situated,

Plaintiff,

v.

SHIELDS HEALTH CARE GROUP, INC.,

Defendant.

SUPERIOR COURT
TRIAL COURT DEPARTMENT

CASE NO. 2382-cv-0023

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, EXPENSES,
AND REPRESENTATIVE PLAINTIFFS' SERVICE AWARDS**

Pursuant to Rule 23 of the Massachusetts Rules of Civil Procedure and to the Settlement Agreement, Representative Plaintiffs hereby move the Courts to award attorneys' fees in the amount of \$5,116,666.67 (33 and 1/3% of the common fund of \$15,350,000.00), expenses in the amount of \$76,276.04, and Service Awards of \$2,500 for each Representative Plaintiff. This motion is based on the attached Memorandum of Law, the declarations and documents submitted in support, and other relevant parts of the record.

Respectfully submitted,

Dated: November 10, 2025

/s/Brendan Jarboe

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Settlement Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2025, a copy of this motion was filed electronically and served on all counsel of record through the electronic filing system and by electronic mail.

/s/ Brendan Jarboe
Brendan Jarboe