

STATE OF NORTH CAROLINA
PITT COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
BUSINESS COURT NO.
24CVS000772-730

TAMMY FLYNN, HEISHA LYNCH, J.L.,
a minor through her mother, HEISHA
LYNCH, DEAN SWINSON, BRANDON
CANNON, BRITTANY MORRE,
ANNAIA MCLAMB, CYNTHIA
MEADOWS, SUZANNE ABRAMS,
LATASHA WILLIAMS, BILLY
ROBINSON, JOSEPH SAWYER,
SAMANTHA RICHARDSON, LORI
POWERS, JASON POWERS,
GENEVIEVE JONES, ELAINE
QUITTKAT, and MARY SHELDON,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

EASTERN RADIOLOGISTS, INC.,

Defendant.

Class Action

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

Plaintiffs Tammy Flynn; Heisha Lynch; J.L., a minor through her mother,
Heisha Lynch; Dean Swinson; Brandon Cannon; Brittany Moore; Annaia McLamb;
Cynthia Meadows; Suzanne Abrams; Latasha Williams; Billy Robinson; Joseph
Sawyer; Samantha Richardson; Lori Powers; Jason Powers; Genevieve Jones; Elaine

Quittkat; and Mary Sheldon (“Plaintiffs”) individually and on behalf of all others similarly situated, hereby move this Court to:

1. Approve an award of reasonable attorneys’ fees in the amount of \$1,500,000;
2. Approve reasonable out-of-pocket costs and expenses in the amount of \$27,934.06, and;
3. Approve service award for each Plaintiff in the amount of \$2,500.

This Motion is based upon: (1) this Motion; (2) the Memorandum of Points and Authorities in Support of this Motion, filed herewith; (3) the Joint Declaration of Class Counsel, filed herewith; (4) the Settlement Agreement; (4) the records, pleadings, and papers filed in this action; and (5) such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: September 26, 2025

Respectfully submitted,

/s/Joel R. Rhine
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Interim Co-Lead Class Counsel

**CERTIFICATE OF COMPLIANCE WITH
BUSINESS COURT RULE 7.8**

The undersigned, in accordance with Business Court Rule 7.8, certifies that the foregoing motion (exclusive of the case caption, signature blocks, and required certificates) contains fewer than 7,500 words, as reported by word-processing software.

This the 26th day of September, 2025.

/s/Joel R. Rhine

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been served on all counsel of record in accordance with Business Court Rule 3.9 through electronic filing with the North Carolina Business Court.

This the 26th day of September, 2025.

/s/Joel R. Rhine

*Attorneys for Plaintiffs and the
Settlement Class*