

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Target Corporation Customer Data
Security Breach Litigation

This Document Relates to:

All Consumer Cases

MDL No. 14-2522 (PAM/JJK)

**CONSUMER PLAINTIFFS' MOTION FOR PAYMENT OF SERVICE AWARDS
TO CLASS REPRESENTATIVES AND FOR AN AWARD OF ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES**

Consumer Plaintiffs, by Lead Counsel Vincent J. Esades, respectfully move this Court for an order (1) approving service awards in the amount of \$500 to each Settlement Class Representative and in the amount of \$1,000 each to the three Class Representatives whose service to the Settlement Class included providing deposition testimony; and (2) awarding attorneys' fees and reimbursement of litigation expenses in the aggregate amount of \$6,750,000. The class notices approved by the Court in its Order Certifying a Settlement Class, Preliminarily Approving Class Action Settlement and Directing Notice to the Settlement Class (ECF No. 364), advised Class Members that Plaintiffs would request service awards of up to \$500 for each Settlement Class Representative and up to \$1,000 for each of the three Class Representatives who were deposed, and that Plaintiffs would request attorneys' fees and expenses up to \$6,750,000. This information has also been available on the website, www.TargetBreachSettlement.com, developed by the Court appointed administrator, Rust Consulting, Inc., since April 30, 2015.

This Motion is based upon the accompanying Memorandum, the Declaration of Consumer Plaintiffs' Lead Counsel Vincent J. Esades in Support of Motion for Payment of Service Awards to Class Representatives and for an Award of Attorneys' Fees and Reimbursement of Expenses, the Declaration of Shannon R. Wheatman, Ph.D. on Partial Costs of the Notice Plan, the Declaration of Amy L. Lake on Partial Costs of the Notice Plan, and upon all files, records and proceedings in this matter.

WHEREFORE, based on the foregoing and for the reasons set forth in the accompanying Memorandum, we respectfully urge the Court to grant Consumer Plaintiffs' Motion.

Dated: July 10, 2015

Respectfully submitted,

s/ Vincent J. Esades
Vincent J. Esades (249361)
David Woodward (018844X)
HEINS MILLS & OLSON, P.L.C.
310 Clifton Avenue
Minneapolis, MN 55403
Tel.: (612) 338-4605
Fax: (612) 338-4692
vesades@heinsmills.com
dwoodward@heinsmills.com

Lead Counsel Consumer Cases

E. Michelle Drake (0387366)
NICHOLS KASTER, PLLP
4600 IDS Center
80 South 8th Street
Minneapolis, MN 55402
Tel.: (612) 256-3200
Fax: (612) 338-4878
drake@nka.com

Liaison Counsel Consumer Cases

John A. Yanchunis
MORGAN & MORGAN COMPLEX
LITIGATION GROUP, PA
201 North Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
Fax: (813) 223-5402
jyanchunis@forthepeople.com

**Executive Committee - Coordinating
Lead and Liaison Counsel**

Daniel C. Girard
GIRARD GIBBS LLP
601 California Street, 14th Floor
San Francisco, CA 94108
Tel.: (415) 981-4800
Fax: (415) 981-4846
DCG@girardgibbs.com

Ariana J. Tadler
MILBERG LLP
One Pennsylvania Plaza, 49th Floor
New York, NY 10119
Tel.: (212) 594-5300
Fax: (212) 868-1229
atadler@milberg.com

Norman E. Siegel
STUEVE SIEGEL HANSON LLP
460 Nichols Road, Suite 200
Kansas City, MO 64112
Tel.: (816) 714-7100
Fax: (816) 714-7101
siegel@stuevesiegel.com

Steering Committee Consumer Cases