

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: MOVEIT CUSTOMER DATA
SECURITY BREACH LITIGATION

MDL No. 1:23-md-03083-ADB-PGL

This Document Relates To:
C.A. No. 1:24-cv-11807-ADB

BEN MORRIS, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

PROGRESS SOFTWARE
CORPORATION; ERNST & YOUNG
LLP; and BANK OF AMERICA
CORPORATION,

Defendants.

**PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES,
REIMBURSEMENT OF EXPENSES, AND SERVICE AWARD FOR THE
SETTLEMENT CLASS REPRESENTATIVE FROM THE BOA / EY SETTLEMENT**

Pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, Plaintiff¹ in the above captioned action consolidated with this multi-district litigation respectfully moves for entry for an order:

1. Approving Class Counsel’s request for an award of attorneys’ fees in the amount of one-fourth (25%) of the Bank of America Corporation (“BOA”) and Ernst & Young, LLP (“EY”) Settlement Fund, totaling \$625,000.00;

¹ Plaintiff is Ben Morris (“Plaintiff” or “Settlement Class Representative”).

2. Approving Class Counsel's request for reimbursement of reasonable litigation expenses in the amount of \$19,200.00; and
3. Approving a Service Award of \$2,500.00 to the Settlement Class Representative in recognition of their participation on behalf of the Settlement Class.

In support of this motion, Plaintiff relies on the accompanying memorandum of law and supporting Declarations of Gary F. Lynch and Alyson Oliver. A proposed order will be submitted to the Court with Plaintiff's forthcoming motion for final approval of the BOA / EY Settlement Agreement.

Dated: August 18, 2026

Respectfully submitted,

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Plaintiffs' Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that, on this date, the foregoing document was filed electronically via the Court's CM/ECF system, which will send notice of the filing to all counsel of record.

Dated: August 18, 2026

/s/ Kristen A. Johnson
Kristen A. Johnson (BBO# 667261)