

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

IN RE: GENERAC SOLAR POWER
SYSTEMS MARKETING SALES
PRACTICES AND PRODUCTS LIABILITY
LITIGATION

Case No. 23-md-03078

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS AND
EXPENSES, AND REPRESENTATIVE PLAINTIFF SERVICE AWARDS**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs Robert Ammon, Marcia Baltimore, Nicole Kibert Basler, John Bettorf, Paul Cartmell, Steve Cothren, Geoff Edwards, Miles Fawcett, Joel Galarza, Melissa Gibson, Daniel Haak, Christopher Helmers, Kevin Hemphill, Albert Kates, Craig Lauder, Kathryn Locatell, Jodi Matas, Dustin Moon, Lori Morse, Adam Plichta, Jason Poston, Anita Richardson, Michael Shirk, Allan Slater, Carolyn Slusher, Rabia Stevenson, Beverly Taylor, Margaret Venema, Kerri Vincent, James Ward, and Mark Wasserman (collectively, "Plaintiffs"), by and through their counsel, respectfully request an order awarding attorneys' fees of \$5,000,000 (one-third of the \$15,000,000 Settlement Fund), reimbursement of reasonable costs and expenses of \$557,566.67, and Service Awards in the amount of \$5,000 to each Representative Plaintiff to be paid from the Settlement Fund created pursuant to Plaintiffs' settlement with Generac.

This Motion is supported by Plaintiffs' Memorandum of Points and Authorities in Support thereof; the Declaration of Mark Chalos in Support thereof; the records, pleadings, and papers filed in this matter; and upon such argument as may be presented to the Court at any hearing of this Motion.

A proposed Order is submitted herewith.

Dated: July 2, 2026

Respectfully Submitted,

By: /s/ Mark P. Chalos

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