

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

SHAYLA MARCOTTE, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

CAVU ECOMMERCE (AMER) LLC,

Defendant.

Civil Action No.: 2025CH06466

Hon. David B. Atkins

Courtroom 2502

**NOTICE OF PLAINTIFF'S MOTION FOR SERVICE AWARD AND ATTORNEYS'
FEES, COSTS, AND EXPENSES**

TO: **SQUIRE PATTON BOGGS (US) LLP**

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Counsel for Defendant

PLEASE TAKE NOTICE that on December 1, 2025 at 10:30 a.m., Plaintiff Shayla Marcotte ("Plaintiff") will appear in the Circuit Court of Cook County, Illinois, Chancery Division, before the Honorable David B. Atkins, or any judge sitting in his stead, to present her ***Motion for Service Award and Attorneys' Fees, Costs, and Expenses***, a copy of which is attached hereto and served upon you. Pursuant to the Court's standing order, the hearing shall take place via Zoom: Meeting ID: 925 5932 0340; Password: 209408.

Plaintiff will move the Court to:

- (a) Award Plaintiff a \$5,000 Service Award;
- (b) Award Plaintiff's Counsel 35% of the Settlement Fund, or \$147,750, in attorneys' fees, costs, and expenses.

Plaintiffs' Motion is based on: this Notice; her Motion for Service Award and Attorneys' Fees, Costs, and Expenses; the Declaration of Philip L. Fraietta and accompanying exhibits attached thereto; and the Declaration of Shayla Marcotte.

Dated: October 23, 2025

Respectfully submitted,

BURSOR & FISHER, P.A.

By: Philip L. Fraietta

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Class Counsel

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused a true and correct copy of the foregoing to be served upon the following parties by e-mail on the date indicated below:

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Counsel for Defendant

Dated: October 23, 2025

Respectfully submitted,

BURSOR & FISHER, P.A.

By: Philip L. Fraietta

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