

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

*In re LastPass Data Security Incident  
Litigation*

Case No. 1:22-cv-12047-PBS

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

Pursuant to Fed. R. Civ. P. 23(h), 52(a), and 54(d)(2), Plaintiffs Amy Doermann, Ayana Looney, Dan LeFebvre, David Andrew, Erik Brook, Glenn Mulvenna, Hui Li, Nathan Goldstein, Noah Bunag, R. Andre Klein, Sarb Dhesi, Steven Carter, Debt Cleanse Group Legal Services LLC, and Hustle N Flow Ventures LLC (“Plaintiffs” or “Settlement Class Representatives”)—having achieved a settlement that creates a \$8.2 million non-reversionary Settlement Fund and a separate Crypto Pool, under which LastPass has agreed to make available up to \$16.25 million to compensate Settlement Class Members who suffered cryptocurrency losses caused by the Incident—move the Court for an award of attorneys’ fees, costs, expenses, and Service Awards.<sup>1</sup>

Plaintiffs’ counsel achieved a favorable result for those affected by the Incident. The requested award of attorneys’ fees, costs, and expenses is fair and reasonable, and the “percentage of the fund” sought is commensurate with fee awards in other class action settlements. Plaintiffs’ counsel worked more than 14,000 hours on this matter from its inception through April 30, 2026, with a total lodestar of \$12,847,477.95 during that time period. *See* Declaration of Class Counsel in Support of Plaintiffs’ Motion for an Award of Attorneys’ Fees, Costs and Expenses, and Service

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms have the definitions set forth in the Class Action Settlement Agreement and Release (“Settlement” or “SA”). *See* Dkt. 305-1. References to “§” are to sections of the Settlement Agreement.

Awards (“Co-Lead Fee Decl.”), ¶¶ 14, 56, which is being filed concurrently with this motion. Plaintiffs’ counsel also incurred \$405,364.71 in litigation costs and expenses. Co-Lead Decl. ¶ 57.

The requested attorneys’ fees and litigation costs and expenses were reasonably and necessarily incurred by Plaintiffs’ counsel in prosecuting and resolving the litigation. Co-Lead Decl. ¶¶ 12, 56, 57. Plaintiffs request a combined award of attorneys’ fees, costs and expenses in the amount of one third of the \$8,200,000 Settlement Fund, and one third of the value of each Valid Claim submitted under the Crypto Pool, plus costs and expenses. *See* Dkt. 305-1, SA §§ 24, 72. Defendant does not oppose this request for attorneys’ fees, costs, and expenses. SA § 72.

Plaintiffs also request Service Awards in the amount of \$10,000 for each of the fourteen Class Representatives, for a total of \$140,000. SA §§ 18, 52, 71. The Class Representatives have been instrumental in assisting Plaintiffs’ counsel in their investigation and litigation of this matter. The Class Representatives provided documentation and detailed information that assisted Plaintiffs’ counsel in drafting the complaints and the discovery responses in this litigation. The Class Representatives prepared for and gave depositions in this case, and they were committed to the litigation and were prepared to be a part of any trial that may have followed. Co-Lead Decl. ¶ 59. Defendant does not oppose the requested Service Awards sought in this motion. SA § 71.

Plaintiffs submit herewith a memorandum setting forth the reasons why the requested attorneys’ fees, costs, expenses, and Service Awards are fair, reasonable and appropriate, and should be awarded. For the reasons set forth in the accompanying memorandum, Plaintiffs request that the Court grant their motion. Class Counsel will submit a final accounting of fees, costs and expenses associated with the completion of the cryptocurrency claims procedure, and reserve the right to seek any expenses and costs incurred after the date of the filing of this Motion relating to the Crypto Pool claims.

Dated: May 19, 2026

Respectfully submitted by:

\* *Admitted Pro Hac Vice*

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***Counsel for the Plaintiffs and the  
Proposed Settlement Class Members***

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), counsel for Plaintiffs conferred with counsel for Defendant before filing this motion, and Defendant does not oppose this motion.

Dated: May 19, 2026

/s/ Amy Keller  
Amy Keller

**CERTIFICATE OF SERVICE**

I hereby certify that this document was filed through the ECF system and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 19, 2026.

Dated: May 19, 2026

/s/ Patrick J. Vallely  
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