

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Taqueria El Primo LLC, Victor Manuel
Delgado Jimenez, Michelle Chavez Solis,
El Chinelo Produce, Inc., Virginia
Sanchez-Gomez, and Benjamin
Tarnowski, on behalf of themselves and
others similarly situated,

Plaintiffs,

v.

Farmers Group, Inc., Truck Insurance
Exchange, Farmers Insurance Company,
Inc., Farmers Insurance Exchange, Illinois
Farmers Insurance Company, and
Mid-Century Insurance Company,

Defendants.

Case No. 19-CV-03071 (JRT/ECW)

**PLAINTIFFS' MOTION FOR
PAYMENT OF ATTORNEYS' FEES,
LITIGATION EXPENSES, AND
SERVICE AWARDS**

Pursuant to Federal Rules of Civil Procedure 23(h) and 54(d)(2), Plaintiffs hereby move and respectfully request that the Court approve and order the payment of attorneys' fees, litigation expenses, and service awards, as described in the submissions accompanying this Motion.

This Motion is based on the documents filed concurrently herewith in support thereof, the pleadings on file in this litigation, the advocacy of counsel at hearing of this Motion, and any other matters the Court may consider.

Dated: June 6, 2025

s/David W. Asp

David W. Asp, MN #0344850

Simeon A. Morbey, MN #0391338

Jennifer L. M. Jacobs, MN #0328753

Derek C. Waller, MN #0401120

LOCKRIDGE GRINDAL NAUEN PLLP

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

Telephone: (612) 339-6900

Facsimile: (612) 339-0981

dwasp@locklaw.com

samorbey@locklaw.com

jlmjacobs@locklaw.com

dcwaller@locklaw.com

Nathan D. Prosser, MN #329745

Anne T. Regan, MN #333852

HELLMUTH & JOHNSON PLLC

8050 West 78th Street

Edina, MN 55439

Telephone: (952) 941-4005

Facsimile: (952) 941-2337

aregan@hjlawfirm.com

nprosser@hjlawfirm.com

Paul J. Phelps, MN #185073

SAWICKI & PHELPS, P.A.

5758 Blackshire Path

Inver Grover Heights, MN 55076

Telephone: (651) 730-6900

Facsimile: (651) 730-8110

pphelps@mnlawyers.com

ATTORNEYS FOR PLAINTIFFS