

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT DEPARTMENT  
C.A. No. 1981CV01957

\_\_\_\_\_)  
MICH KAREN PIERRE LOUIS, Individually and )  
On behalf of all others similarly situated )  
others similarly situated, )  
Plaintiff, )  
v. )  
BAYADA HOME HEALTH CARE, INC., )  
DAVID BAIADA and J. MARK BAIADA, )  
Defendants. )  
\_\_\_\_\_)

**RECEIVED**  
6/6/2022

**UNOPPOSED MOTION FOR AWARD OF ATTORNEYS' FFES AND EXPENSES**

Plaintiff, Mich Karen Pierre Louis (“Plaintiff”), by and through her undersigned counsel of record, hereby moves for an award of attorneys’ fees in the sum of \$50,000 and expenses in the sum of \$1,100, and an incentive award of \$3,500 to the Plaintiff.

The grounds for this motion are set forth in the accompanying memorandum of law. This Motion is also supported by the Declaration of David Pastor, the Declaration of Richard B. Reiling, and the Declaration of Mich Karen Pierre Louis.

Dated: June 6, 2022

Respectfully submitted,

**PASTOR LAW OFFICE**

By: /s/ David Pastor  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify, under penalty of perjury, that on June 6, 2022, I caused copies of the foregoing Unopposed Motion for Award of Attorneys' Fees and Expenses to be served via email upon counsel for Defendants as follows:

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/s/ David Pastor  
David Pastor