

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

MONICA SULLIVAN, individually, and on behalf )		
of all others similarly situated, )	)	
	)	
Plaintiff, )	)	Civil Action No. 8:22-cv-00418-TDC
	)	
v. )	)	
	)	
YES ENERGY MANAGEMENT, INC., and )	)	
YARDI SYSTEMS, INC., )	)	
	)	
Defendants. )	)	

**MOTION FOR APPROVAL OF INCENTIVE AWARD TO THE REPRESENTATIVE  
PLAINTIFF**

Pursuant to ¶ Z.2.a & b of the Settlement Agreement in this case (ECF No. 51-1), Plaintiff Monica Sullivan (“Representative Plaintiff”) respectfully requests that this Court approve an incentive awards to her of \$15,000 – an award which Defendant YES Energy Management, Inc. has agreed to pay separate and apart from the Common Settlement Fund in this case, and which will not diminish or affect the relief to other Settlement Class members. The requested award is warranted because Representative Plaintiff secured the proposed Settlement in this case not only on behalf of herself, but in favor of thousands of other similarly situated consumers. This type of award is both permissible and desirable where, as here, a class action has achieved a significant benefit for a large number of people as the result of a lawsuit filed on their behalf by a class representative.

Further grounds and authorities in support of this Motion are contained in the accompanying memorandum of law, which is incorporated.

WHEREFORE, Representative Plaintiffs respectfully requests that this Court approve an incentive payment to her of \$15,000, and enter the comprehensive proposed Final Order Approving Settlement and Certifying Settlement Class.

Respectfully submitted,

/s/ Benjamin H. Carney  
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**Attorneys for Representative Plaintiff and the  
Settlement Class**