

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PENSION TRUST FUND FOR OPERATING  
ENGINEERS, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

DEVRY EDUCATION GROUP, INC., DANIEL  
HAMBURGER, RICHARD M. GUNST,  
PATRICK J. UNZICKER, AND  
TIMOTHY J. WIGGINS,

Defendants.

Case No. 1:16-CV-05198

Hon. Mary M. Rowland

**LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES  
AND PAYMENT OF LITIGATION EXPENSES**

PLEASE TAKE NOTICE that Lead Counsel Labaton Sucharow LLP (“Lead Counsel”), on behalf of itself and all Plaintiffs’ Counsel, will move this Court on December 6, 2019 at 9:30 a.m., in Courtroom 1225, for an Order, pursuant to Rules 23(h) and 54 of the Federal Rules of Civil Procedure: (a) awarding attorneys’ fees in the amount of 27% of the Settlement Fund; (b) awarding litigation expenses in the amount of \$184,192.69, plus accrued interest; (c) approving Lead Plaintiff’s request for payment of its costs and expenses related to its representation of the Settlement Class, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4(a)(4); and (d) for such other and further relief as this Court deems just and proper.

Lead Counsel is contemporaneously herewith filing a Memorandum of Law and the Declaration of Carol C. Villegas in Support of (I) Lead Plaintiff’s Motion for Approval of Class Action Settlement and Plan of Allocation and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses, dated November 1, 2019, with annexed exhibits, in support of this motion.

A proposed order will be submitted on November 27, 2019 with Lead Counsel’s reply papers, after the deadline for objecting has passed.

Dated: November 1, 2019

By: /s/ Carol C. Villegas

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2019, I electronically filed the foregoing Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses, using the Court's CM/ECF system, which will be sent electronically to the registered participants as identified on the attached Electronic Mail Notice List.

*/s/ Carol C. Villegas*

\_\_\_\_\_  
Carol C. Villegas

**Mailing Information for a Case 1:16-cv-05198**

*Pension Trust Fund for Operating Engineers v. DeVry Education Group, Inc. et al.*

**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

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### **Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing).

- (No manual recipients)