

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA**

DARRELL EDEN; RANDY BACON;  
ESTATE OF CHRISTOPHER BROWN;  
through personal representative Paula Rhea  
Brown; ESTATE OF MARTIN  
CHOUINARD, through administrator *ad*  
*litem* April Hancock; SANDRA  
CULBERTSON; ESTATE OF DENISE  
CULPEPPER, through personal  
representative April Richard; LAURA  
FULLER; ESTATE OF BRANDON GASH,  
b/n/k Harry and Sheryl Gash; BENJAMIN  
NEWTON HANNAH; KRIS HOLDER;  
AMANDA LENNIE; SHELBY LONG;  
TERA MILLER; BRYAN WAMPLER; and  
SHARON WATERS, on behalf of  
themselves and all others similarly situated;  
and AVERY L. SHARP; CHELSEA  
COULTER; KENDRA MICKEL; and  
ZACHARY GUINN, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

vs.

BRADLEY COUNTY, TENNESSEE;  
SHERIFF STEVE LAWSON, in his official  
capacity; CAPTAIN JERRY JOHNSON,  
JR., in his official capacity; ERIC WATSON,  
in his individual capacity; and CAPTAIN  
GABRIEL THOMAS, in his individual  
capacity,

Defendants.

Case No.: 1:18-cv-217-CHS

**CLASS ACTION**

**COMPLAINT PURSUANT TO 42 U.S.C.  
1983**

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**PLAINTIFFS' UNOPPOSED MOTION FOR ATTORNEY'S FEES AND COSTS  
PURSUANT TO RULES 23(h) AND 54(d)(2) OF  
THE FEDERAL RULES OF CIVIL PROCEDURE**

Come Named Plaintiffs / Putative Class Representatives Darrell Eden; Randy Bacon; the  
Estate of Christopher Brown, through personal representative Paula Rhea Brown; the Estate of

Martin Chouinard, through administrator *ad litem* April Hancock; Sandra Culbertson, the Estate of Denise Culpepper, through personal representative April Richard; Laura Fuller; the Estate of Brandon Gash, by next of kin Harry and Sheryl Gash; Benjamin Newton Hannah; Kris Holder; Amanda Lennie; Shelby Long; Tera Miller; Bryan Wampler; Sharon Waters; Avery L. Sharp; Chelsea Coulter; Kendra Mickel; and Zachary Guinn, on behalf of themselves and of all members of the Damages Class and Injunctive Relief Class (“Plaintiffs”), and, for the reasons explained in the accompanying memorandum of law [115] in support of this unopposed<sup>1</sup> motion to award and order Defendants, Bradley County, Tennessee (“Bradley County”); Sheriff Steve Lawson, in his official capacity; Captain Jerry Johnson, Jr., in his official capacity; Eric Watson, in his individual capacity; and Captain Gabriel Thomas, in his individual capacity (“Defendants”) to pay Class Counsel the sums of **(1) one million, one hundred forty-thousand dollars and zero cents (\$1,140,000.00) in attorney’s fees, and (2) one hundred twenty thousand and forty-six dollars and thirteen cents (\$120,046.13) in litigation costs and expenses, for a total of one million two hundred sixty thousand and forty-six dollars and thirteen cents (\$1,260,046.13)**, to be paid as specified in the Settlement Agreement.

Dated: April 3, 2024.

Respectfully submitted,

By: /s/ C. Scott Johnson  
C. Scott Johnson, BPR No. 019810  
William J. Rieder, BPR No. 026551  
Joseph Alan Jackson II, BPR No. 030203  
SPEARS, MOORE, REBMAN & WILLIAMS, P.C.  
601 Market Street, Suite 400 | P. O. Box  
1749

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<sup>1</sup> The Settlement Agreement [107-1] provides, with respect to (i) attorney’s fees that “Defendants take no position on the reasonableness of the Attorney’s Fees Amount but will not oppose the motion seeking same and agree to pay same if approved by the Court”; and (ii) litigation costs and expenses that “Defendants take no position on the reasonableness of the Expenses Amount but will not oppose the motion seeking same and agree to pay same if approved by the Court.” (*Id.* § 11(a)-(b).)

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of April 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

By: /s/ Joseph Alan Jackson II