

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

STACI CHESTER, et al.,
Plaintiffs,
vs.
TJX COMPANIES, INC., et al.,
Defendants.

EDCV 15-01437 ODW (DTBx)

CLASS ACTION

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND COSTS,
COSTS OF ADMINISTRATION,
AND REPRESENTATIVE
ENHANCEMENT PAYMENTS**

Courtroom: 5D – First Street
Judge: Hon. Otis D. Wright, II

1 This matter has come before the Court pursuant to Plaintiffs’ Motion for
2 Attorneys’ Fees and Costs, Costs of Administration, and Representative
3 Enhancement Payments (“Fee Motion”), filed on March 13, 2018.

4 The Court, having considered the Fee Motion, as well as the accompanying
5 memorandum of points and authorities, declarations of Douglas Caiafa, Christopher
6 J. Morosoff, Greg Hafif, Michael G. Dawson, Staci Chester, Robin Berkoff, Theresa
7 Metoyer, Daniel Friedman, and Jennifer M. Keough (Regarding Proposed Notice
8 Plan), having considered the arguments and views of counsel for the Parties, and all
9 of the files, records, and proceedings herein, and it appearing to the Court that the
10 requested fees, costs and enhancement payments appear fair, reasonable and
11 adequate;

12 **NOW, THEREFORE, IT IS HEREBY ORDERED:**

- 13 1. This Court hereby finds and concludes that due and adequate notice was
14 directed to all persons and entities who are Class Members, advising them of
15 Class Counsel’s intent to seek attorneys’ fees and costs and service awards, the
16 amounts thereof, and their right to object thereto;
- 17 2. A full and fair opportunity was accorded to all such persons and entities to be
18 heard with respect to the Fee Motion. No Class Member objected to Class
19 Counsel’s request for attorneys’ fees and costs or service payments;
- 20 3. The Court hereby grants Class Counsel’s request for an award of attorneys’
21 fees in the amount of \$2,125,000.00;
- 22 4. The Court hereby grants Class Counsel’s request for reimbursement of
23 litigation costs in the amount of \$40,050.97;
- 24 5. The Court hereby grants Plaintiffs’ request for class representative
25 enhancement payments in the amount of \$7,500 each to each named Plaintiff;
26 and,

1 6. The awarded attorneys' fees and costs, and class representative enhancement
2 payments shall be paid pursuant to the terms, conditions and obligations of the
3 Settlement Agreement.

4 This Court shall maintain continuing jurisdiction over these settlement
5 proceedings to assure the effectuation thereof for the benefit of the Settlement Class.

6
7 **IT IS SO ORDERED**

8
9
10 Dated: _____, 2018

11 HON. OTIS D. WRIGHT, II
12 United States District Judge