

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway
Roseland, New Jersey 07068
Telephone: (973) 228-9898
Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SIMON MAJDIPOUR, PAMELA
AUSTIN, BRIAN FUCHS, CHARLES
MANIS, JASON MANOWITZ, and
MARVINA ROBINSON, individually, and
on behalf of a class of similarly situated
individuals,

Plaintiffs,

v.

JAGUAR LAND ROVER NORTH
AMERICA, LLC,

Defendant.

Civil Action No.: 2:12-cv-07849-MCA-LDW

**NOTICE OF MOTION FOR
AWARD OF ATTORNEYS' FEES,
EXPENSES AND INCENTIVE AWARDS**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on February 3, 2019, in Courtroom MLK 4A of the above-captioned Court, located at 50 Walnut Street, Newark, New Jersey 07101, the Honorable Madeline Cox Arleo, U.S.D.J. presiding, Plaintiffs Simon Majdipour, Pamela Austin, Brian Fuchs, Charles Manis, Jason Manowitz and Marvina Robinson will, and hereby do, move this Court to enter an Order approving Class Counsel's attorneys' fees and costs, and award incentive payments the named Plaintiffs.

This Motion is based upon: (1) this Notice of Motion; (2) the Brief; (3) the Declaration of

Matthew Mendelsohn; (4) the Declaration of Payam Shahian; (5) the Declaration of Dara Tabesh; (6) the [Proposed] Order; (7) the records, pleadings, and papers filed in this action; and (8) upon such other documentary and oral evidence or argument as may be presented to the Court at the hearing of this Motion.

Dated: December 9, 2019

By:



Matthew Mendelsohn
MAZIE SLATER KATZ & FREEMAN, LLC
103 Eisenhower Parkway
Roseland, New Jersey 07068
Telephone: (973) 228-9898
Facsimile: (973) 228-0303
e-mail: mmendelsohn@mskf.net