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**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

**[PROPOSED] ORDER AWARDING
ATTORNEYS' FEES, COSTS AND
INCENTIVE AWARDS**

This matter having been opened to the Court by motion filed by Class Counsel for an Order awarding attorneys' fees, expenses, and incentive awards on notice to Defendant, and the Court having considered the submissions and arguments of counsel; and for the reasons set forth on the record; and for good cause shown;

IT IS on this ____ date of _____, 2020;

ORDERED as follows:

1. Class Counsel are awarded attorneys' fees in the amount of \$_____.

2. Class Counsel are awarded expenses in the amount of \$_____.

3. Plaintiffs is request for incentive awards to the Plaintiffs in the aggregate amount of \$16,000 is granted and shall be distributed as follows\$5,000 to Plaintiff Simon Majdipour; \$3,000 to Plaintiff Pamela Austin; and \$2,000 each to Plaintiffs Brian Fuchs, Charles Manis, Jason Manowitz, and Marvinna Robinson.

IT IS SO ORDERED.

Hon. Madeline Cox Arleo, U.S.D.J.