

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

Jane Doe and John Does 1 and 2, on behalf of
themselves and all others similarly situated,

Plaintiffs,

-against-

MasterCorp, Inc.,

Defendant.

INDEX NO. 1:24-cv-678

**[PROPOSED] ORDER GRANTING AWARD OF
ATTORNEYS' FEES AND LITIGATION
COSTS AND FOR CLASS REPRESENTATIVE
SERVICE PAYMENTS**

Before the Court is Plaintiffs' Motion for an Award of Attorneys' Fees¹ and Litigation Costs and for Class Representative Service Payments.

WHEREAS, Interim Co-Lead Counsel moved the Court for Attorneys' Fees, Litigation Costs, and Service Payments for Class Representatives on October 18, 2024 (Dkt. No. 24);

WHEREAS, no members of the Class and Collective objected to the Amended Settlement or Interim Co-Lead Counsel's request for Attorneys' Fees; and

WHEREAS, this Court has considered all of the submissions related to the Motion, and is otherwise fully advised of all relevant facts in connection therewith;

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. The Court **GRANTS** an award of Attorneys' Fees for Interim Co-Lead Counsel of \$1,650,000, or 33% of the Total Settlement Amount;

¹The Amended Settlement Agreement is attached as Exhibit 1 to the Notice of Amendments to Settlement Agreement. Dkt. 13-1. Unless otherwise noted, all capitalized terms in this Motion carry the same meaning as set forth in the Amended Settlement Agreement.

2. The Court **GRANTS** an award of Litigation Costs of \$22,246 for Interim Co-Lead Counsel's reasonable out-of-pocket expenditures in this litigation; and

3. The Court **GRANTS** an award of \$7,500 to each Class Representative, Jane Doe, John Doe #1, and John Doe #2, that is, \$22,500, in recognition of their service to this case.

IT IS SO ORDERED.

DATED: _____

MICHAEL S. NACHMANOFF
UNITED STATES DISTRICT JUDGE