

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

_____		
SEAN ROSE and JAIME ROSE,	:	
	:	Case No. 2:19-cv-00977-GJP
Plaintiffs,	:	
	:	
v.	:	
	:	
THE TRAVELERS HOME AND MARINE	:	
INSURANCE COMPANY,	:	
	:	
Defendant.	:	
_____		X

**PLAINTIFFS’ UNOPPOSED MOTION FOR AWARD OF  
REASONABLE ATTORNEYS’ FEES AND INCENTIVE AWARD**

Pursuant to Federal Rules of Civil Procedure Rule 23(h) and 54(d)(2), Plaintiffs, by and through undersigned counsel, respectfully move this Court for an Order approving Plaintiffs’ Motion for Award of Reasonable Attorneys’ Fees and an Incentive Award. Plaintiffs seek an order, in connection with and contingent upon, the approval of Settlement in this Civil Action:

(1) Awarding reasonable Class Counsel attorneys’ fees and reimbursement of litigation costs to Class Counsel in the amount of \$1,900,000.00 total, and;

(2) Approving an Incentive Award in the amount of \$10,000 total, jointly to the Settlement Class Representatives SEAN and JAIME ROSE, husband and wife, to be paid separately by the Defendant.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter an Order approving the award of reasonable attorneys’ fees and an Incentive Award as requested herein.

**Respectfully submitted,**

BY: <u>      /s/ Anthony DiUlio      </u> ANTHONY DiULIO, ESQUIRE Attorney I.D. No.: 312763 One Penn Center - Suite 1270 1617 JFK Boulevard Philadelphia, PA 19103	BY: <u>      /s/ Kenneth J. Grunfeld      </u> Kenneth J. Grunfeld, Esquire Attorney I.D. No.: 84121 GOLOMB & HONIK 1835 Market Street, Suite 2900 Philadelphia, PA 19103 <a href="mailto:kgrunfeld@golombhonik.com">kgrunfeld@golombhonik.com</a>
<i>Attorneys for Plaintiffs and the Proposed Class</i>	

Date: April 28, 2020

**CERTIFICATE OF SERVICE**

I, Kenneth Grunfeld, Esquire, hereby certify that a true and correct copy of the foregoing was served via electronic filing.

*/s/ Kenneth J. Grunfeld*

**KENNETH GRUNFELD, ESQUIRE**

*Attorney for Plaintiffs and the Proposed Class*

Date: **April 28, 2020**