

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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

**[PROPOSED] ORDER APPROVING PLAINTIFFS’ MOTION FOR AWARD OF REASONABLE ATTORNEYS’ FEES AND INCENTIVE AWARD**

And now, this \_\_\_\_ day of \_\_\_\_\_, 2020, upon review and consideration of Plaintiffs’ Motion and Memorandum in Support of Motion for Award of Reasonable Attorneys’ Fees and Incentive Award and the exhibits attached thereto (collectively referred to as “Plaintiffs’ Fee Petition”); upon consideration of all prior proceedings in this action; and oral arguments presented at the June 4, 2020 final approval hearing on the terms of Settlement;

It is hereby **ORDERED** as follows:

1. Pursuant to Federal Rules of Civil Procedure 23(h) and 54(d)(2), and in connection with the approval of Settlement in this Civil Action, the Court hereby grants Plaintiffs’ Fee Petition. The Court finds the requested attorneys’ fees totaling \$1.9 million and Incentive Award totaling \$10,000 are reasonable and should be awarded as set forth below.
2. The Court finds Class Counsel achieved substantial benefits for the Class.

3. The Court finds Class Counsels' skill and experience enhanced the Settlement, and Class Counsel took on a substantial risk by taking this case on contingency basis and advancing all litigation expenses.

4. The Court also finds that factors utilized by courts to determine the reasonableness of fee awards, including the contingent nature of the litigation, the time and labor required, the costs expended, the complexities of this case, and, the skills, experience and reputation of Class Counsel demonstrated throughout the case more than support the requested fee award.

5. In connection with this litigation, Class Representatives SEAN and JAIME ROSE were vital to the process. They engaged in extensive individual document discovery, were intimately involved in the divulgence and exploration of the nature of their injuries and were active in the settlement of the Civil Action on a class-wide basis.

6. The Court finds an Incentive Award for Class Representatives SEAN and JAIME ROSE, husband and wife, jointly in the total amount of \$10,000, is appropriate for their efforts in prosecuting the case. The payment for the Incentive Award will be made separately by the Defendant.

7. In accordance with the terms of this Order and the terms and conditions of the approved final Settlement, Defendant shall submit payment for Plaintiffs' attorneys' fees in the amount of \$1.9 million and an Incentive Award in the amount of \$10,000 as per the Settlement Agreement between the Parties now approved by the Court.

IT IS SO ORDERED in Philadelphia, Pennsylvania, this \_\_\_\_ day of \_\_\_\_\_, 2020.

**BY THE COURT:**

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**HONORABLE U.S. DISTRICT JUDGE  
GERALD J. PAPPERT, J.**