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on behalf of himself and all others similarly situated

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 FRED TOLLINI, an individual, on behalf of
14 himself and others similarly situated,

15 Plaintiff,

16 vs.

17 CGI FEDERAL INC., a Delaware Corporation;
18 CGI TECHNOLOGIES AND SOLUTIONS
INC., a Delaware Corporation; and DOES 1
19 through 50, inclusive,

20 Defendants.
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Case No.: 18-cv-03275-MMC

*[Assigned for all purposes to the Honorable
Maxine M. Chesney]*

CLASS ACTION

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION FOR
AWARD OF ATTORNEYS' FEES AND
COSTS AND CLASS REPRESENTATIVE
ENHANCEMENT AT FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

*[Filed concurrently with Notice of Motion and
Motion; Memorandum in Support; and
Supporting Declarations of David Yeremian,
Lluvia Islas, and Fred Tollini]*

Date: September 4, 2020
Time: 9:00 a.m.
Courtroom.: 7

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ORDER

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2 This matter has come before the Court on the unopposed motion by Plaintiff Fred Tollini
3 (“Plaintiff”), on behalf of himself and the preliminarily approved Settlement Class of similarly
4 situated employees of Defendant CGI FEDERAL INC., a Delaware Corporation (“Defendant”)
5 (together, the “Parties”), for an Order awarding the requested attorneys’ fees and reasonable
6 litigation costs to Plaintiff’s counsel and awarding the Class Representative Enhancement and
7 Service Award to Plaintiff, as addressed in detail in the parties’ Stipulation of Settlement of Class
8 Action and Release of Claims (“Settlement Agreement”). The Court granted preliminary approval
9 to the Settlement Agreement on May 22, 2020. (ECF No. 53).

10 Plaintiff, without opposition by Defendant, requests entry of this Order in connection with
11 the final approval of the Settlement Agreement awarding Class Counsel reasonable attorneys’ fees
12 of up to \$87,500.00, which is 25% of the Gross Fund Value of \$350,000.00, Class Counsel’s a
13 maximum of costs up to \$16,000.00, and awarding Plaintiff \$5,000.00 as a Class Representative
14 Enhancement and Service Award for his dedicated efforts on behalf of the Class members.

15 Having considered the Notice of Motion and Unopposed Motion, the Memorandum of
16 Points and Authorities, and the Declarations of David Yeremian, Lluvia Islas, and Plaintiff Fred
17 Tollini, along with the Settlement Agreement, and having considered all submissions and
18 arguments by Counsel, the Court grants Plaintiff’s request for attorney fees, litigation costs, and
19 class representative enhancement.

20 **IT IS HEREBY ORDERED THAT:**

21 1. Pursuant to the Settlement Agreement, preliminarily approved Class Counsel of
22 David Yeremian & Associates, Inc. have incurred and will incur reasonable attorneys’ fees in this
23 action and are hereby awarded, upon distribution following final approval, attorneys’ fees of
24 \$87,500.00, which is 25% of the Gross Fund Value of \$350,000.00;

25 2. Pursuant to the Settlement Agreement, preliminarily approved Class Counsel of
26 David Yeremian & Associates, Inc. have incurred and will incur reasonable litigation costs in this
27 action and are hereby awarded, upon distribution following final approval, litigation costs of up to
28 \$16,000.00 (with Class Counsel’s present costs estimated to be \$12,767.56). Class Counsel will

1 provide a supplemental declaration and updated costs invoice in connection with final approval.

2 3. The Court further approves a Class Representative Service Award payment of
3 **\$5,000.00** to Class Representative, Fred Tollini, for initiating this action, for work he has
4 performed on behalf of the Class, and for risks he has undertaken.

5 **IT IS SO ORDERED.**

6 DATED: _____

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8 HONORABLE MAXINE M. CHESNEY
9 JUDGE OF THE NORTHERN DISTRICT OF CALIFORNIA

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