

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DONNA MOORE, FRENCHOLA HOLDEN
and KEITH MCMILLON, individually and on
behalf of all others similarly situated,

Plaintiffs,

Civil Action No. 2:07-cv-04296-PD

v.

GMAC MORTGAGE, LLC, GMAC BANK
and CAP RE OF VERMONT, INC.,

Defendants.

**[PROPOSED] ORDER GRANTING PLAINTIFFS' UNOPPOSED MOTION FOR
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES AND
CASE CONTRIBUTION AWARDS TO THE NAMED PLAINTIFFS**

The matter having come before the Court on September 17, 2014, on the application of Class Counsel for an award of attorneys' fees, reimbursement of expenses incurred in the Action, and for Case Contribution Awards to the Named Plaintiffs, having considered all papers filed and proceedings conducted herein, having found the Settlement of this Action to be fair, reasonable, and adequate, and otherwise being fully informed in the premises and good cause appearing therefrom:¹

IT IS HEREBY ORDERED AND ADJUDGED:

1. The Court has jurisdiction over the subject matter of this application and all matters relating thereto, including all members of the Settlement Class.

¹ All of the capitalized terms used herein shall have the same meanings as set forth in the Settlement Agreement dated as of January 24, 2014, and filed with this Court. *See* Dkt. No. 272-3.

2. Class Counsel is hereby awarded attorneys' fees of \$ _____ and reimbursement of expenses in the sum of \$ _____, to be paid from the Settlement Fund. The Court finds that the amount of fees awarded is fair and reasonable given the substantial risks of non-recovery, the time and effort involved, and the results obtained for the Settlement Class.

3. Named Plaintiff Donna Moore is awarded \$ _____ as a Case Contribution Award, as defined in the Settlement Agreement, in recognition of her contribution to this Action.

4. Named Plaintiff Frenchola Holden is awarded \$ _____ as a Case Contribution Award, as defined in the Settlement Agreement, in recognition of her contribution to this Action.

5. Named Plaintiff Keith McMillon is awarded \$ _____ as a Case Contribution Award, as defined in the Settlement Agreement, in recognition of his contribution to this Action.

SO ORDERED, this ____ day of _____, 2014.

The Honorable Paul S. Diamond
United States District Judge