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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST DISTRICT**  
By: I. Arellanes

COLIN HIGGINS PRODUCTIONS, LTD.,

Plaintiff,

v.

PARAMOUNT PICTURES  
CORPORATION, and DOES 1-100,

Defendant.

AND RELATED CASES

Case No. BC499179

Related Cases: BC499181, BC499182,  
BC500040, and BC540146

CLASS ACTIONS

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, COSTS, AND  
SERVICE AWARDS**

Date: November 7, 2016  
Time: 10:00 A.M.

*Assigned for All Purposes to:  
Hon. Elihu M. Berle, Dept. 323*

1 On November 7, 2016, this Court presided over a hearing on Plaintiffs’ Motion for Attorneys’  
2 Fees, Costs, and Service Awards (“Motion”). Having considered the proposed Settlement Agreement,  
3 Plaintiffs’ Motion and the points and authorities raised in support thereof, the facts asserted in the  
4 supporting declarations filed by the law firms, settlement administrator and named plaintiffs, as well  
5 as the arguments of counsel at the hearing, and good cause appearing, the Court hereby grants  
6 Plaintiffs’ Motion and makes the following Orders:

7 1. The Court, for purposes of this Order, adopts the terms and definitions set forth in the  
8 Settlement Agreement, as modified herein.

9 2. The Court finds that the total lodestar for the law firms comprising Class Counsel,  
10 Pearson, Simon & Warshaw, LLP, Johnson & Johnson LLP, Kiesel Law LLP, and Boucher LLP,  
11 based on their historical hourly rates, is \$1,300,765.38. The Court finds that this amount is reasonable  
12 based on the amount of work performed by Class Counsel. In light of the novelty and difficulty of this  
13 action, Class Counsel’s skill and effort in dealing with the complex issues presented by this case, and  
14 the substantial benefit obtained for the Class, the Court finds that it is appropriate to apply a negative  
15 lodestar multiplier of 0.87 for an award of attorneys’ fees in this case of \$1,135,000. Accordingly, the  
16 Court grants Plaintiffs’ request for attorneys’ fees in the amount of \$1,135,000.

17 3. The Court also finds that Class Counsel have incurred \$38,286.69 in verified litigation  
18 costs in connection with this litigation. These costs were reasonably incurred in the ordinary course of  
19 prosecuting this case and necessary given the complex nature and scope of the case. The Court finds  
20 that Class Counsel are entitled to be reimbursed for these costs. Accordingly, the Court grants  
21 Plaintiffs’ request for litigation costs in the amount of \$38,286.69

22 4. The Court also finds that the requested reimbursement to settlement administrator  
23 Angeion Group of settlement administration costs in the amount of \$49,500.00 is appropriate. These  
24 costs were reasonably incurred in the ordinary course of administration and necessary for the  
25 administration of the settlement, including provision of notice to the Class, among other things.  
26 Accordingly, the Court grants Plaintiffs’ requests for settlement administration costs in the amount of  
27 \$49,500.00.

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1           5.       The Court further approves a service award of \$10,000 to each of the class  
2 representatives, Colin Higgins, Ltd., and Michael Elias (collectively, "Plaintiffs"). These service  
3 awards are justified by: (1) the risks Plaintiffs faced in bringing this lawsuit, financial and otherwise;  
4 (2) the amount of time and effort spent on this case by Plaintiffs; and (3) the benefits Plaintiffs helped  
5 obtain for the Class Members under the Settlement Agreement. Accordingly, the Court grants  
6 Plaintiffs' request for service awards in the amount of \$10,000 each.

7           6.       The attorneys' fees, costs, and service awards set forth in this Order shall be paid and  
8 distributed in accordance with the terms of the Settlement Agreement.

9           **IT IS SO ORDERED.**

10  
11 DATED: \_\_\_\_\_

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HON. ELIHU M. BERLE

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