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**UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII**

STEPHEN G. AQUILINA and LUCINA J. AQUILINA, Individually and on Behalf of All Others Similarly Situated; and DONNA J. CORRIGAN and TODD L. CORRIGAN, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

CERTAIN UNDERWRITERS AT LLOYD'S LONDON; LLOYD'S SYNDICATE #2003; LLOYD'S SYNDICATE #318; LLOYD'S SYNDICATE #4020; LLOYD'S SYNDICATE #2121; LLOYD'S SYNDICATE #2007; LLOYD'S SYNDICATE #1183; LLOYD'S SYNDICATE #1729; LLOYD'S SYNDICATE #510; BORISOFF INSURANCE SERVICES, INC. d/b/a MONARCH E&S INSURANCE SERVICES; SPECIALTY PROGRAM GROUP, LLC d/b/a SPG INSURANCE SOLUTIONS, LLC; ALOHA INSURANCE SERVICES, INC.; ILIKEA LLC d/b/a MOA INSURANCE SERVICES HAWAII; and DOES 1-100,

Defendants.

No. 1:18-cv-00496-JMS-KJM

**[PROPOSED] ORDER
GRANTING PLAINTIFFS'
MOTION FOR AN AWARD
OF ATTORNEYS' FEES,
LITIGATION EXPENSES,
AND SERVICE AWARDS**

Trial Judge: J. Michael
Seabright

This matter having come before the Court on August 15, 2022, on the motion of Class Counsel for an award of attorneys' fees, litigation expenses, and service awards ("Motion"), the Court, 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 therefore;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:

1. All of the capitalized terms used herein shall have the same meanings as set forth in the Settlement Agreement and Release ("Settlement Agreement") filed with the Court. ECF No. 408.

2. This Court has jurisdiction over the subject matter of this application and all matters relating thereto, including all Members of the Class who have not timely and validly requested exclusion.

3. The Court hereby GRANTS Plaintiffs' Motion and awards Class Counsel attorneys' fees of \$_____ and expenses of \$_____ to be paid from the Settlement Fund. The Court finds that the amount of fees awarded is appropriate and is fair and reasonable given the substantial risks of non-recovery, the time and effort involved, and the result obtained for the Class. *See Vizcaino v. Microsoft Corp.*, 290 F.3d 1043 (9th Cir. 2002).

4. The awarded attorneys' fees and expenses shall be paid subject to the terms, conditions and obligations of the Settlement Agreement, and in particular ¶4.5(a) thereof, which terms, conditions and obligations are incorporated herein.

5. The Court hereby GRANTS Plaintiffs' Motion and awards Service Awards to the following Plaintiffs in the amounts indicated: \$_____ to the Aquilina Plaintiffs and \$_____ to the Corrigan Plaintiffs. Such an award is reasonable considering each Plaintiff's active participation in this Litigation. Payment of the incentive awards shall be made pursuant to the Settlement Agreement, ¶4.5(a)(ii).

6. Pursuant to the Settlement Agreement, ¶14.16, the Court shall retain jurisdiction with respect to the implementation and enforcement of the terms of the Settlement Agreement and the Parties to the Settlement Agreement submit to the jurisdiction of the Court for those purposes.

IT IS SO ORDERED.

Dated: _____

HON. J. MICHAEL SEABRIGHT
U.S. DISTRICT COURT JUDGE