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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST**

COLIN HIGGINS PRODUCTIONS, LTD.,  
  
Plaintiff,  
  
vs.  
  
UNIVERSAL CITY STUDIOS, LLC, and  
DOES 1-100,  
  
Defendant.

CASE NO. BC499180 (related to BC499179,  
BC499181, BC499182, BC500040, and  
BC540146)

**CLASS ACTION**

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

Assigned to the Honorable Hon. Elihu M.  
Berle (Dept. CCW-323)

[Complaint Filed: January 16, 2013]

1 This matter came on for review on December 11, 2015. The Court, having considered the  
2 proposed Settlement Agreement; Plaintiffs’ Motion for Attorneys’ Fees, Costs and Incentive  
3 Awards; the points and authorities and declarations in support thereof as well as the arguments of  
4 counsel; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

7 2. The Court finds that Pearson, Simon & Warshaw, LLP, Johnson & Johnson LLP,  
8 Kiesel Law LLP and Boucher LLP’s (“Class Counsel”) lodestar, based on their historical hourly  
9 rates, is \$ \_\_\_\_\_. The Court finds that this amount is reasonable based upon the  
10 amount of work performed by Class Counsel. In light of the novelty and difficulty of this action;  
11 Class Counsel’s skill and effort in dealing with the complex issues presented by this case; and the  
12 substantial benefit obtained for the Class, the Court finds that Class Counsel is entitled to a  
13 lodestar multiplier of \_\_\_\_ for an award of attorneys’ fees in this case of \$ \_\_\_\_\_.

14 3. The Court also finds that Class Counsel have incurred \$ \_\_\_\_\_ in  
15 litigation costs in connection with this litigation. These costs were reasonably incurred in the  
16 ordinary course of prosecuting this case and necessary given the complex nature and scope of the  
17 case. The Court finds that Class Counsel are entitled to be reimbursed for these costs.

18 4. The Court further approves an incentive award of \$ \_\_\_\_\_ to each of  
19 the class representatives, Colin Higgins Productions, Ltd., Indigo, Inc. and Lynn Unger Children’s  
20 Trust (collectively, “Plaintiffs”). These incentive awards are justified by: (1) the risks Plaintiffs  
21 faced in bringing this lawsuit, financial and otherwise; (2) the amount of time and effort spent on  
22 this case by Plaintiffs; and (3) the benefits Plaintiffs helped obtain for the Class Members under  
23 the Settlement Agreement.

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

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2015

\_\_\_\_\_  
HONORABLE ELIHU M. BERLE  
Judge of the Superior Court