

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Yvonne Becker, Christopher Nobles, Rosa Ramirez, Valerie Seyler, and Jannien Weiner,

Plaintiffs,

v.

Wells Fargo & Co.; Employee Benefit Review Committee; Wells Fargo Bank, National Association, and John and Jane Does, 1-20,

Defendants.

Case No. 0:20-cv-02016 (KMM/BRT)

[PROPOSED] ORDER AWARDING ATTORNEYS' FEES, EXPENSE REIMBURSEMENT, SETTLEMENT ADMINISTRATION EXPENSES, AND CASE CONTRIBUTION AWARDS

CLASS ACTION

This matter came before the Court on August 10, 2022, on Plaintiffs' Motion for Attorneys' Fees, Expense Reimbursement, Settlement Administration Expenses, and Case Contribution Awards. The Court, having considered all papers filed and proceedings conducted:

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED as follows:

1. All of the capitalized terms used herein shall have the same meanings as set forth in the Settlement Agreement dated March 8, 2022 and filed with the Court. (ECF No. 248-1).
2. This Court has jurisdiction over the subject matter of this application and all matters relating thereto, including all members of the Settlement Class.
3. Class Counsel are hereby awarded attorneys' fees of \$_____, which is appropriate and fair and reasonable given the risks of non-recovery, the time and

effort involved, and the result obtained for the Settlement Class. Class Counsel is also awarded an expense reimbursement of \$_____ for litigation expenses, which are reasonable and the type of expenses that would normally be charged to a fee-paying client. The attorney's fees and expenses shall be paid to Class Counsel in accordance with the terms of the Settlement Agreement. No other fees may be awarded to Class Counsel in connection with the Settlement.

4. The Court approves the payment of Settlement Administration Expenses of no more than \$400,000 to Analytics Consulting, LLC, no more than \$1,000 to EagleBank, and no more than \$15,000 to Gallagher Fiduciary Advisors.

5. Named Plaintiffs Yvonne Becker, Christopher Nobles, Rosa Ramirez, Valerie Seyler, and Jannien Weiner are hereby awarded Case Contribution Awards in the amount of \$15,000 each, which the Court finds to be fair and reasonable.

Dated: _____, 2022.

Katherine M. Menendez
United States District Court Judge