

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JULIE KIMBALL, Individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

VOLKSWAGEN GROUP OF
AMERICA, INC., VOLKSWAGEN
AKTIENGESELLSCHAFT, AUDI
AKTIENGESELLSCHAFT and AUDI
OF AMERICA, INC.,

Defendant.

Civil Action No. 2:22-cv-04163-MAH

**[PROPOSED] ORDER GRANTING
PLAINTIFF’S MOTION FOR AN
AWARD OF ATTORNEYS’ FEES,
REIMBURSEMENT OF EXPENSES
AND PLAINTIFF’S SERVICE
AWARD**

THIS MATTER having come before the Court for consideration of Plaintiffs’ Motion for an Award of Attorneys’ Fees, Reimbursement of Expenses, and Plaintiff’s Service Award filed in connection with the parties’ Settlement Agreement in the above captioned matter;

WHEREAS, unless otherwise defined in this Order, the terms used in this Order that are defined in the Settlement Agreement shall have the same meaning as set forth in the Settlement Agreement;

WHEREAS, Defendant Volkswagen of Group of America, Inc. (“VWGoA” or “Defendant”), and Plaintiff Julie Kimball reached a Class settlement (the “Settlement”);

WHEREAS, the parties submitted the Settlement Agreement together with their Motion for Preliminary Approval of the proposed Settlement to the Court

WHEREAS, the Court gave its preliminary approval of the Settlement on May 30, 2025, the “Preliminary Approval Order”) [ECF 106] and directed, *inter alia*, that Class Notice of the Settlement be effectuated pursuant to the approved Notice Plan;

WHEREAS, Plaintiff submitted her Motion for an Award of Attorneys’ Fees and Expenses and Class Representative Service Award on September 30, 2025 [ECF 107];

WHEREAS, Plaintiff submitted her Motion for Final Approval of Class Action Settlement on November 4, 2025 [ECF 123], and ;

WHEREAS, on December 4, 2025, the Court conducted the Final Fairness Hearing to determine whether the proposed Settlement is fair, reasonable, and adequate; whether the objections should be overruled or sustained; whether the Settlement should be granted final approval by this Court; whether Class Counsel’s request for attorneys’ fees and reimbursement of expenses in the total collective amount of \$1,950,000 should be awarded; and whether the request for a service award to the Named Plaintiff in the amount of \$3,500 should be approved;

WHEREAS, the parties having appeared at the Final Approval Hearing, and the Court having reviewed Plaintiff’s Motion for an Award of Attorneys’ Fees,

Reimbursement of Expenses, and Plaintiff's Service Award, all motions, briefs and submissions filed, and proceedings held herein, in connection with the Settlement, and the record in the Action, and good cause appearing therefore;

and for the reasons set forth on the record on December 4, 2025;
IT IS ON THIS 4th day of December, 2025, **ORDERED** that Plaintiff's Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Plaintiff's Service Award is hereby **GRANTED** as follows:

1. The Court finds that Class Counsel's request for attorneys' fees, reimbursement of expenses, and the Plaintiff's service award, are fair and reasonable.

2. The Court hereby grants Class Counsel's request for an award of reasonable attorneys' fees of **\$1,935,390.33**, and reimbursement of expenses in the amount of **\$14,609.67**, together totaling **\$1,950,000.00**.

3. The Court hereby grants Class Counsel's request to pay a service award to Plaintiff Julie Kimball in the amount of \$3,500.00.

4. The payments shall be made by wire transfer to Kantrowitz, Goldhamer, & Graifman, P.C. ("KGG") within thirty (30) days of the Effective Date of the Settlement.

5. Said payment to KGG shall fully satisfy and discharge all obligations of Defendant and the Released Parties with respect to payment of the

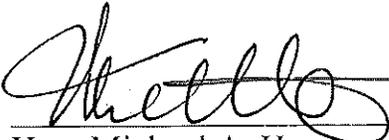
Class Counsel Fees and Expenses, any attorneys' fees in connection with this Action, and Settlement Class Representative service award, and KGG shall thereafter have sole responsibility to distribute the appropriate portions of said payment to the other Class Counsel and the Settlement Class representative.

6. Nothing in this Order, shall, in any way, constitute, be deemed to constitute, be construed or argued as, or be considered or admissible as evidence of: (i) an admission by any Party or any Released Parties as to the substance and merits of any allegation, claim or defense that was or could have been asserted in this Action; (ii) any finding of either fact or law as to the substance and merits of any claim or defense that was or could have been asserted in the Action; (iii) an admission or evidence of any liability, wrongdoing, or responsibility on the part of the Defendants or any Released Party; and (iv) as evidence, or be offered or admissible as evidence, against any Defendant, Released Party, or the Plaintiff in any action or proceeding, judicial or otherwise, except as necessary to enforce the terms of the Settlement Agreement and/or this Final Order and Judgment.

7. There being no just reason to delay, the Clerk is directed to enter this Order forthwith.

IT IS SO ORDERED AND ADJUDGED.

Dated: 12/4/2025



Hon. Michael A. Hammer
United States Magistrate Judge

For the reasons stated on the Record on December 4, 2025.