

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

JED and ALISA BEHAR, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NORTHROP GRUMMAN CORPORATION
AND NORTHROP GRUMMAN SYSTEMS
CORPORATION,

Defendants

Case No. 21-cv-03946-HDV-SK

CLASS ACTION

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

Before the Court is Plaintiffs’ Motion for an Award of Attorneys’ Fees, Litigation Expenses, and Class Representative Service Awards (the “Motion”). The Court has considered the Motion, the supporting declarations and exhibits, the Settlement Agreement, the record in this Action, any opposition or objections filed in response to the Motion, and any argument presented at the hearing.

Having fully considered the matter, and for good cause shown, the Court finds and ORDERS as follows:

Attorneys’ Fees. The Motion is GRANTED. Pursuant to Federal Rule of Civil Procedure 23(h), the common-fund doctrine, and applicable Ninth Circuit and California law, the Court finds that an award of attorneys’ fees in the amount of \$30,000,000.00, representing forty percent (40%) of the \$75,000,000.00 Settlement Fund, is fair and reasonable.

In reaching this conclusion, the Court has considered, among other things, the results obtained for the Settlement Class; the complexity and duration of the Action; the substantial risks undertaken by Class Counsel; the skill and experience required to prosecute the Action; the quality of Class Counsel’s representation; the advanced stage of the litigation at which the Settlement was achieved; the contingent nature of the representation; the substantial time and resources devoted to the Action; the absence of any guarantee of compensation or reimbursement; the absence of a reversion of Settlement Funds to

1 Defendants; the absence of a clear-sailing provision; the reaction of the Settlement Class; and the
2 applicable market rates and fee awards in comparable cases.

3 Lodestar Cross-Check. The Court further finds that the requested attorneys' fee award is
4 reasonable when cross-checked against Class Counsel's lodestar. Class Counsel devoted approximately
5 15,356.50 hours to the prosecution of this Action, resulting in a lodestar of approximately \$19,803,041.75.
6 The requested \$30,000,000.00 fee represents a multiplier of approximately 1.51, which the Court finds
7 reasonable in light of the circumstances of this Action, including the contingent nature and substantial
8 risks of the litigation, the complexity and duration of the proceedings, the results achieved, and the
9 advanced stage of the litigation at settlement.

10 Litigation Expenses. The Motion is GRANTED as to Class Counsel's request for reimbursement
11 of litigation expenses. Pursuant to Federal Rule of Civil Procedure 23(h), Class Counsel are awarded
12 reimbursement of \$2,371,230.09 in reasonable and necessary litigation expenses advanced in prosecuting
13 the Action. The Court finds that these expenses were reasonably and necessarily incurred in connection
14 with the prosecution and resolution of this Action and include, among other things, expert and consultant
15 fees, mediation expenses, deposition-related expenses, electronic discovery and document-management
16 costs, travel, filing fees, and other litigation expenses ordinarily chargeable to a fee-paying client.

17 Class Representative Service Awards. The Motion is GRANTED as to the requested service
18 awards. Pursuant to Federal Rule of Civil Procedure 23 and the Court's equitable authority, the Court
19 approves a service award of \$30,000.00 to Class Representative Jedidiah Behar and a service award of
20 \$30,000.00 to Class Representative Alisa Behar, for a total of \$60,000.00.

21 The Court finds that these awards are reasonable and appropriate in light of the Class
22 Representatives' substantial and sustained efforts on behalf of the Settlement Class, including their
23 participation in discovery, depositions, mediation, trial proceedings, and other activities undertaken over
24 the more than five-year duration of this litigation.

25 Source of Payments. The attorneys' fees, litigation expenses, and Class Representative service
26 awards approved by this Order shall be paid from the \$75,000,000.00 Settlement Fund in accordance with
27 the terms of the Settlement Agreement and the Court's prior orders.

1 IT IS SO ORDERED.

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3 DATED: _____, 2026

4 HON. HERNÁN D. VERA

5 UNITED STATES DISTRICT JUDGE
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