

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LOUISE LIVINGSTON,
MELISSA RAINEY, DAVID
SMITH, RAYMOND
SABBATINE, PETER GOLDIS,
and BILL COLBERT, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

TRANE U.S. INC.,

Defendant.

Civ. A. No. 2:17-cv-06480-ES-MAH

The Honorable Esther Salas, U.S.D.J.

The Honorable Michael A. Hammer,
U.S.M.J.

Return Date: August 12, 2020
(pursuant to Order, Dkt. No. 104)

CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR
AWARD OF ATTORNEYS' FEES AND EXPENSES
AND PLAINTIFFS' INCENTIVE AWARDS**

Timothy N. Mathews
Zachary P. Beatty (*pro hac vice*)
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PLEASE TAKE NOTICE that on August 12, 2020 at 12:00PM, or as soon as the matter may be heard by the Honorable Magistrate Judge Michael A. Hammer of the United States District Court for the District of New Jersey, located at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, courtroom MLK 2C, Plaintiffs Louise Livingston, Melissa Rainey, David Smith, Raymond Sabbatine, Peter Goldis, and Bill Colbert will and hereby do move for entry of the proposed Order Granting Plaintiffs' Motion for Award of Attorneys' Fees and Expenses and Plaintiffs' Incentive Awards submitted herewith.

Plaintiffs request that this Court approve the attorneys' fees and expense request of \$1,800,000. Plaintiffs further request this Court approve \$5,000 incentive award payments to each of the named Plaintiffs.

This Motion is based on this Notice of Motion and the Memorandum of Law filed by Plaintiffs herewith, the record in this action, the argument of counsel, and any other matters the Court may consider.

DATED: June 4, 2020

Respectfully submitted,

s/ Timothy N. Mathews

Timothy N. Mathews

Zachary P. Beatty (pro hac vice)

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Timothy N. Mathews, certify that on this 4th day of June 2020, I caused the foregoing *Plaintiffs' Notice Of Motion And Motion For Award Of Attorneys' Fees And Expenses And Plaintiffs' Incentive Awards* to be filed using the Court's CM/ECF system, thereby causing it to be served upon all registered ECF users in this case.

s/ Timothy N. Mathews
Attorney for Plaintiffs