

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: NAME: E. Michelle Drake, MN Bar No. 0387366 (pro hac vice) FIRM NAME: BERGER MONTAGUE PC STREET ADDRESS: 43 SE Main Street, Suite 105 CITY: Minneapolis STATE: MN ZIP CODE: 55414 TELEPHONE NO.: 612.594.5999 FAX NO.: 612.584.4470 E-MAIL ADDRESS: emdrake@bm.net ATTORNEY FOR (name): Plaintiff, Ian Douglas	FOR COURT USE ONLY SUBMITTED on 7/3/2019 10:38 AM Reviewed By: R. Walker Case #18CV331732 Envelope: 3086162
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA STREET ADDRESS: 191 North First Street MAILING ADDRESS: 191 North First Street CITY AND ZIP CODE: San Jose, CA 95113 BRANCH NAME: DOWNTOWN SUPERIOR COURT (DTS)	CASE NUMBER: 18-cv-331732
PLAINTIFF/PETITIONER: IAN DOUGLAS, individually, as a representative of the class, DEFENDANT/RESPONDENT: DHI GROUP, INC. and DICE INC. OTHER:	JUDICIAL OFFICER: Hon. Thomas E. Kuhnle
PROPOSED ORDER (COVER SHEET)	DEPT: 5

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

1. Name of the party submitting the proposed order:
Plaintiff, Ian Douglas

2. Title of the proposed order:
Proposed Order on Plaintiff's Motion for Attorney Fees, Costs, and Class Representative Service Awards

3. The proceeding to which the proposed order relates is:
 - a. Description of proceeding: Final Approval Hearing
 - b. Date and time: August 2, 2019 at 9:00 am
 - c. Place: Department 5
Superior Court of California for the County of Santa Clara
191 North First Street
San Jose, CA 95113

4. The proposed order was served on the other parties in the case.

John G. Albanese

(TYPE OR PRINT NAME)



(SIGNATURE OF PARTY OR ATTORNEY)

CASE NAME: 18-cv-331732	CASE NUMBER: 18-cv-331732
----------------------------	------------------------------

**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action.**

a. My residence or business address is (*specify*):
Business address: 43 SE Main Street, Suite 105, Minneapolis, MN 55414

b. My electronic service address is (*specify*): jalbanese@bm.net

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):
Angela E. Kleine and James F. McCabe, Attorneys for Defendants

b. To (*electronic service address of person served*): AKleine@mofo.com; JMcCabe@mofo.com

c. On (*date*): July 3, 2019

Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: July 3, 2019

John G. Albanese

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA**

IAN DOUGLAS, individually, as a
representative of the class, and on behalf of
the general public,

Plaintiff,

v.

DHI GROUP, INC. and DICE INC.,

Defendants.

Case No.: 18-cv-331732

**[PROPOSED] ORDER ON
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS,
AND CLASS REPRESENTATIVE
SERVICE AWARDS**

Case No.: 18-cv-331732

1 Plaintiff Ian Douglas (“Plaintiff”), on behalf of himself and the Settlement Class
2 Members, and Defendants DHI Group, Inc. and Dice Inc. (together, “Dice,” and
3 collectively with Plaintiff, the “Parties”), have entered into a Settlement Agreement dated
4 November 29, 2018 (the “Settlement Agreement”), providing for the settlement of this
5 case (the “Settlement”).

6 A Fairness Hearing was held before this Court on August 2, 2019 to consider,
7 among other things, whether the Settlement represents a fair, reasonable and adequate
8 compromise of the Action, and the amount to be paid to Class Counsel as fees and
9 litigation costs for prosecuting the Action. Having considered the evidence and argument
10 submitted by the Parties, and any objections to the Settlement submitted,

11 **GOOD CAUSE APPEARING, IT IS HEREBY ORDERED, ADJUDGED**
12 **AND DECREED THAT** Plaintiffs’ Motion for Attorneys’ Fees, Costs, and Class
13 Representative Service Awards is **GRANTED**.

14 Having reviewed the submissions of Class Counsel, the Court finds that an award
15 of one-third of the Settlement Fund in attorneys’ fees (\$333,333), up to \$32,098.08 to
16 reimburse Class Counsel for out-of-pocket, documented expenses, is reasonable
17 compensation for Class Counsel’s attorneys’ fees and expenses. The Settlement
18 Administrator shall pay these sums out of the Settlement Payment to each Named Plaintiff
19 within five (5) days of receipt of funds from Defendant, in accordance with Section 6.4 of
20 the Settlement Agreement.

21 Having reviewed the submissions of Class Counsel and Plaintiffs, the Court finds
22 that the sums of \$5,000 for Plaintiff is reasonable compensation for the Named Plaintiff’s
23 services in this matter. The Settlement Administrator shall pay these sums out of the
24 Settlement Payment to each Named Plaintiff within five (5) days of receipt of funds from
25 Defendant, in accordance with Section 6.4 of the Settlement Agreement.

26 Having reviewed the submissions of Class Counsel, the Court finds that the sum
27 not to exceed \$56,800 is reasonable compensation for the settlement administration
28 services provided by Angeion Group in this matter.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO ORDERED.

Dated: _____

Hon. Thomas E. Kuhnle
Judge of the Superior Court