

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

_____	:	CIVIL ACTION
KENNETH J. SILVER, et al.	:	
	:	
v.	:	Case No. 10-cv-2326-MMB
	:	
L.A. FITNESS INTERNATIONAL, LLC	:	
_____	:	
JOSHUA VAUGHN	:	
	:	
v.	:	Case No. 11-cv-2644-MMB
	:	
L.A. FITNESS INTERNATIONAL, LLC	:	
_____	:	
AMALIA SIBLE	:	
	:	
v.	:	Case No. 13-cv-0255-MMB
	:	
L.A. FITNESS INTERNATIONAL, LLC	:	
_____	:	

**PLAINTIFFS’ MOTION FOR (1) FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND (2) AWARD OF ATTORNEYS’ FEES AND
REIMBURSEMENT OF EXPENSES AND INCENTIVE
PAYMENTS FOR PLAINTIFFS**

Plaintiffs Kenneth J. Silver, Joshua Vaughn, Lori C. Bohn, Sharon N. Lockett, Justin P. Bronzell, and Amalia Sible (collectively, “Plaintiffs”) hereby move for judgments and orders: (1) approving the National Class Action Settlement and Release, dated March 6, 2013 (the “Stipulation”) and dismissing this action with prejudice; and (2) awarding Plaintiffs’ counsel attorneys’ fees and reimbursement of expenses.

These facts and arguments supporting this Motion are set forth in the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement, the Memorandum of Law in Support of Plaintiffs' Counsel's Application for an Award of Attorneys' Fees and Expenses and Incentive Payments for Plaintiffs, the declarations and affidavits submitted in support thereof, the Stipulation and supporting exhibits, the papers and filings on record in this matter and such additional evidence or argument as may be presented at the hearing.

Dated: August 22, 2013

BERGER AND MONTAGUE, P.C.

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