

SUPREME COURT OF THE STATE OF NEW YORK  
RICHMOND COUNTY  
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SHAUNNA BOREHAM, *on behalf of  
herself and all others similarly situated,*

*Plaintiff,*

-against-

DANA MOTORS, LTD and JAMES  
COGNETTA,

*Defendants.*  
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Index No. 152690/2019

Stipulation and [Proposed] Order

It is hereby stipulated, by and between the above-referenced parties, as follows:

- (1) The Class Action Settlement in this case is fair, adequate, reasonable, and in the best interests of the class members, including the amount of the settlement fund; the amount of distributions to class members; the procedure for objecting to or opting out of the Settlement; and the maximum amounts allocated as additional compensation, costs and attorneys' fees; and
- (2) The Class Action Settlement should be preliminarily approved by the Court; and
- (3) Within 21 days following the date of entry of an Order preliminarily approving the Class Action Settlement, the Defendants shall provide the Settlement Administrator a database or spreadsheet listing the information about class members as set forth in the Parties' Settlement Agreement; and
- (4) The Settlement Administrator shall provide notice to class members as set forth in the Settlement Agreement; and
- (5) The deadlines for members of the Settlement Class to opt out of the Settlement Class or to object to the Settlement shall be the date 60 days after the date of mailing of the class

notice by the Settlement Administrator; and

- (6) A Final Fairness Hearing should be held on a date between 106 and 120 days from the date of entry of this Order; and at the Courthouse for the Supreme Court of the State of New York, Richmond County, located at ~~26 Central Avenue~~ <sup>18 Richmond Terrace Room 209</sup>, Staten Island, New York, at which time the Court will consider whether the Settlement should be finally approved as fair, adequate, reasonable, and in the best interests of the class members, and rule on the motion for approval of attorneys' fees, costs and additional payments to be submitted by Plaintiff; and

- (7) Plaintiff shall file a Motion for Final Approval and for approval of attorneys' fees, costs, and additional payments to be returnable at least 15 days before the Final Fairness

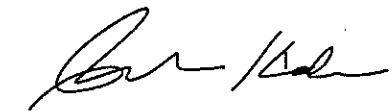
Hearing.

In Person

\*Final Fairness Hearing will be held on ~~April 27~~ <sup>June 7</sup> 2023 at 2:30 PM to 4:30 PM. Notice to be sent by Settlement Administrator

KAKALEC LAW PLLC

WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP



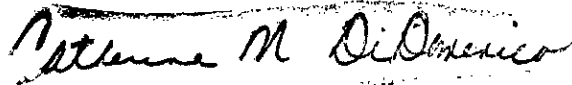
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SO ORDERED:

Staten Island, New York  
February 6, 2023



Hon. Catherine M. DiDomenico, J.S.C.