

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

DANA POTVIN, LISA BULTMAN,  
MICHAEL MCKARRY, DAVID  
WABAKKEN, MOHAMED HASSAN,  
CHRISTINA MERRILL, ERIC LEVINE,  
PATRICK DONAHUES, DEBBI BROWN,  
CAROL RADICE, TERRENCE BERRY,  
AMANDA GREEN, DAVID  
WILDHAGEN, KATY DOYLE, TASHIA  
CLENDANIEL, HOGAN POPKESS,  
KORY WHEELER, HARRY O'BOYLE,  
JOE RAMAGLI, ERIC KOVALIK,  
CHARLES HILLIER, LABRANDA  
SHELTON, ADAM MOORE, TINA  
GROVE, KEECH ARNSTEN, SCOTT  
CARTER, MIKE SHERROD, CHRISTI  
JOHNSON, MARY KOELZER AND  
MARK STEVENS, Individually And On  
Behalf Of All Others Similarly Situated,  
Plaintiffs,

vs.

VOLKSWAGEN  
AKTIENGESELLSCHAFT,  
VOLKSWAGEN GROUP OF AMERICA,  
INC., and VOLKSWAGEN GROUP OF  
AMERICA CHATTANOOGA  
OPERATIONS, LLC,  
Defendants.

Case No.: 2:22-cv-01537 (EP) (JSA)

**NOTICE OF MOTION**

Plaintiffs, on behalf of themselves and the proposed Class, respectfully submit this unopposed Motion pursuant to Rule 23(h) of the Federal Rules of Civil Procedure for entry of an Order granting Plaintiffs' request for attorneys' fees and

reimbursement of expenses, and awarding service awards to the Class Representatives.

In support, Plaintiffs have filed a Memorandum of Law and the Declaration of James E. Cecchi, Esq., with exhibits thereto.

For the reasons set forth in the Memorandum of Law, Plaintiffs respectfully request that the Court grant their Motion and enter the accompanying [Proposed] Order.

Dated: November 4, 2024

Respectfully submitted,

**CARELLA, BYRNE, CECCHI,  
BRODY & AGNELLO, P.C.**

*s/ James E. Cecchi*

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Class

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