

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

C.P., individually and on behalf of F.P.,
a minor child; D.O. individually and on
behalf of M.O., a minor child; S.B.C.,
individually and on behalf of C.C., a
minor child; A.S., individually and on
behalf of A.A.S., a minor child; M.S.,
individually and on behalf of her minor
child, H.S.; Y.H.S., individually and on
behalf of his minor child, C.H.S.; E.M.
on behalf of her minor child, C.M.;
M.M., individually and on behalf of
K.M.; L.G., individually and on behalf
of her minor child, T.M.; E.P.,
individually and on behalf of her minor
child, Ea.P.; and on behalf of ALL
OTHERS SIMILARLY SITUATED,
Plaintiffs,

Civil Action No. 19-cv-12807

v.

NEW JERSEY DEPARTMENT OF
EDUCATION; KEVIN DEHMER,
Interim Commissioner of Education, in
his official capacity,
Defendants.

**NOTICE OF UNOPPOSED
MOTION FOR FINAL
APPROVAL OF SETTLEMENT
AGREEMENT AND AWARD OF
ATTORNEYS' FEES**

PLEASE TAKE NOTICE that Plaintiffs hereby move this Court for an Order granting final approval of the Consent Order and Settlement Agreement and awarding the negotiated \$4,750,000 in attorneys' fees and costs to Plaintiffs' Counsel. This Motion is based upon the accompanying (1) Memorandum of Law; (2) Declaration of Catherine Merino Reisman in Support of Unopposed Motion for

Final Approval of Settlement Agreement and Attorneys' Fees and exhibits; (3) Declaration of Catherine Merino Reisman in Support of Motion for Attorneys' Fees for Reisman Carolla Gran & Zuba LLP and exhibits; (4) Certification of David R. Giles and exhibit; (5) Declaration of Gregory G. Little in Support of Motion for Attorneys' Fees for Education Law Center and exhibit; (6) Certification of Robert C. Thurston in Support of Fee Petition Portion of Final Settlement and exhibit; (7) Declaration of Denise Lanchantin Dwyer in Support of Motion for Final Approval of Settlement Agreement and Attorneys' Fees and exhibit; (8) Declaration of Jeffrey I. Wasserman in Support of Motion for Final Approval of Settlement Agreement and Attorneys' Fees and exhibit; (9) Certification of Thomas J. O'Leary and exhibit; (10) Declaration of Donald A. Soutar and exhibit; and (11) Affirmation of Krista Rue and exhibits, filed separately; all pleadings and other documents on file in this action; and all matters of which the Court may take judicial notice.

Dated: March 11, 2024

/s/ Catherine Merino Reisman
Catherine Merino Resiman
Judith A. Gran (admitted *pro hac vice*)
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Class Counsel

CERTIFICATE OF SERVICE

I, Catherine Merino Reisman, certify that I served all parties and counsel of record the following documents by causing the same to be sent via the ECF system on the date indicated below.

- Notice of Motion
- Memorandum of Law in Support of Unopposed Motion for Final Approval of Settlement Agreement and Award of Attorneys' Fees and Costs
- Proposed Form of Order
- Declaration of Catherine Merino Reisman in Support of Unopposed Motion for Final Approval of Settlement Agreement and Attorneys' Fees
- Declaration of Catherine Merino Reisman in Support of Motion for Attorneys' Fees for Reisman Carolla Gran & Zuba LLP
- Certification of David R. Giles
- Declaration of Gregory G. Little in Support of Motion for Attorneys' Fees for Education Law Center
- Certification of Robert C. Thurston, Esq. in Support of Fee Petition Portion of Final Settlement
- Declaration of Denise Lanchantin Dwyer in Support of Motion for Final Approval of Settlement Agreement and Attorneys' Fees
- Declaration of Jeffrey I. Wasserman in Support of Motion for Final Approval of Settlement Agreement and Attorneys' Fees
- Certification of Thomas J. O'Leary
- Declaration of Donald A. Soutar
- Affirmation of Krista Rue, Esq.

Dated: March 11, 2024

/s/ Catherine Merino Reisman
Catherine Merino Reisman