

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

BARBARA EDWARDS, in her capacity as Trustee in Bankruptcy of Roxbury Surgical Center, LLC, f/d/b/a Roxbury Open MRI and Surgery Center, and NORTH JERSEY AMBULATORY SURGERY CENTER, LLC, *individually and on behalf of all others similarly situated,*

Plaintiffs,

v.

HORIZON BLUE CROSS BLUE SHIELD OF NEW JERSEY,

Defendant.

CIVIL ACTION NO. 08-cv-6160(KM)

**PLAINTIFF'S MOTION FOR AN
AWARD OF ATTORNEYS' FEES
AND COSTS AND CLASS
REPRESENTATIVE SERVICE
AWARD**

PLEASE TAKE NOTICE that pursuant to this Court's March 29, 2018 Preliminary Approval Order, on June 29, 2018 at 10:00 a.m., or as soon thereafter as the Court shall direct, counsel will move pursuant to Federal Rule of Civil Procedure 23(h) and the terms of the Settlement Agreement before the Honorable Kevin McNulty, U.S.D.J. for an order awarding attorneys' fees and reimbursement of expenses to Plaintiffs' counsel in an amount not to exceed \$9 million and a Class Representative Service Fee Award in the amount of \$5,000 for Plaintiff Barbara Edwards, in her capacity as Trustee in Bankruptcy of Roxbury Surgical Center, LLC, f/d/b/a Roxbury Open MRI and Surgery Center.

In support plaintiffs will rely upon Plaintiffs' Brief in Support of Motion for Attorneys' Fees and Expenses and Class Representative Service Fee Award, and the Certifications of Bruce H. Nagel and Neil Prupis.

A Proposed Order is also submitted herewith.

Respectfully submitted this 12th day of June, 2018

NAGEL RICE, LLP

/s/ Bruce H. Nagel

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Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s Bruce H. Nagel

Dated: June 12, 2018