UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ARTEM V. GELIS, BHAWAR PATEL, ROBERT MCDONALD, JAMES V. OLSON, GREGORY HEYMAN, SUSAN HEYMAN, DEBRA P. WARD, DARRIAN STOVALL, ALEX MARTINEZ, AMANDA GOREY, CHRIS WILLIAMS, ASHOK PATEL, KENNETH GAGNON, MICHAEL CERNY, ERHAN ARAT, ANDRE MALSKE, CRAIG LASH, NICOLE GUY, DAVID RICHARDSON, KAREN HENDERSON and ERIC T. ZINN, individually and on behalf of all others similarly situated, Plaintiffs, v. BAYERISCHE MOTOREN WERKE AKTIENGESELLSCHAFT AND BMW OF NORTH AMERICA, LLC., Defendants.	Civil Action No. 17-cv-7386 WHW-CLW

PLAINTIFFS' NOTICE OF MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES AND CLASS REPRESENTATIVES SERVICE PAYMENTS

PLEASE TAKE NOTICE that pursuant to this Court's September 9, 2020 Preliminary Approval Order, on February 16, 2021 at 11:00 a.m., or as soon thereafter as the Court shall direct, Representative Plaintiffs, Artem V. Gelis, Bhawar Patel, Robert McDonald, James V. Olson, Gregory Heyman, Susan Heyman, Debra P. Ward, Darrian Stovall, Alex Martinez, Amanda Gorey, Chris Williams, Ashok Patel, Kenneth Gagnon, Michael Cerny, Maria Meza, Andre Malske, Nicole Guy, David Richardson, Stacey Turner and Eric T. Zinn (hereinafter collectively "Plaintiffs") will move pursuant to Federal Rule of Civil Procedure 23(h)and the terms of the Settlement Agreement before the Honorable Cathy L. Waldor, U.S.M.J., for an order awarding

attorneys' fees and reimbursement of expenses to Plaintiffs' counsel in an agreed upon amount between $1,500,000.00 and $3,700,000.00 and Class Representative Service Payments in the amount of $1,000 each for each of the Plaintiffs.

In support Plaintiffs will rely upon Plaintiffs' Brief in Support of Motion for Attorneys' Fees and Expenses and Class Representative Service Payments, and the Joint Declaration of Gary S. Graifman, Thomas P. Sobran and Bruce H. Nagel in Support of Approval of Class Action Settlement and Award of Attorneys' Fees and Reimbursement of Expenses with attachments. A proposed Final Approval Order is submitted herewith.

Respectfully submitted this 8th day of December, 2020.

KANTROWITZ, GOLDHAMER & GRAIFMAN, P.C.

/s/ Gary S. Graifman
Gary S. Graifman, Esq.
210 Summit Avenue
Montvale, New Jersey 07645
Telephone: (201) 391-7000

THOMAS P. SOBRAN, P.C.
Thomas P. Sobran (p*ro hac vice*)
7 Evergreen Lane
Hingham, MA 02043
Telephone: (781) 741-6075

NAGEL RICE, LLP
Bruce H. Nagel, Esq.
Randee M. Matloff, Esq.
103 Eisenhower Parkway
Roseland, NJ 07068
Telephone: (973) 618-0400 (ext. 119)

Class Counsel for Conditionally Certified Class