

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HOKKY TJAHJONO and MILES BLACK,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

WESTINGHOUSE AIR BRAKE  
TECHNOLOGIES CORPORATION, d/b/a  
WABTEC CORPORATION,

Defendant.

Case No. 2:23-cv-531-WSS

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES,  
COSTS, AND SERVICE AWARDS TO REPRESENTATIVE PLAINTIFFS**

Plaintiffs Hokky Tjahjono and Miles Black (collectively, "Plaintiffs"), through undersigned counsel, respectfully move this Court for an award of attorneys' fees in the amount of \$208,333.33 from the proposed class action settlement entered into with Defendant Westinghouse Air Brake Technologies Corporation, d/b/a Wabtec Corporation ("Wabtec" or "Defendant"), representing one-third of the total settlement fund. Plaintiffs and Settlement Class Counsel further request an award of \$9,505 to Settlement Class Counsel as reimbursement of reasonable litigation expenses, and Service Awards in the amount of \$5,000 each for Representative Plaintiffs Hokky Tjahjono and Miles Black.

This motion is made in advance of Plaintiffs' anticipated motion for final approval of the proposed class action settlement, which is set for a final fairness hearing before the Court on

January 21, 2025. Grounds in support of this motion are provided in Plaintiffs' Memorandum of Law, the joint declaration of Jamisen A. Etzel and Marc E. Dann; and the exhibits attached thereto.

WHEREFORE, Plaintiffs respectfully request that the Court grant their motion and enter their attached proposed order.<sup>1</sup>

Dated: November 12, 2024

Respectfully Submitted,

/s/ Jamisen A. Etzel

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*Counsel for Plaintiffs and Proposed Settlement Class*

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<sup>1</sup> To comply with the local rules, Plaintiffs are providing a standalone proposed order in connection with this motion, but their forthcoming motion for final approval of the proposed class settlement will also include a proposed final judgment order that incorporates the relief sought herein.