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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JULIA JUNGE and RICHARD JUNGE, on
behalf of themselves and a class of similarly
situated investors,

Plaintiffs,

v.

GERON CORPORATION and JOHN A.
SCARLETT,

Defendants.

Case No. 3:20-cv-00547-WHA (DMR)

Class Action

(Consolidated with Case No. 3:20-cv-
01163-WHA)

(Related to Case No. 3:20-cv-02823-WHA;
3:22-mc-80051-WHA)

**[PROPOSED] ORDER GRANTING
LEAD COUNSEL’S MOTION FOR AN
AWARD OF ATTORNEYS’ FEES,
REIMBURSEMENT OF
LITIGATION EXPENSES AND
AWARDS TO LEAD PLAINTIFFS FOR
LOST WAGES UNDER 15 U.S.C. § 78u-
4(a)(4)**

Case No. 3:20-cv -00547-WHA (DMR)

1 Lead and Class Counsel, Kaplan Fox & Kilsheimer LLP (“Lead Counsel”), has filed a
2 Motion for an Award of Attorneys’ Fees, Reimbursement of Litigation Expenses and Awards to
3 Lead Plaintiffs for Lost Wages under 15 U.S.C. § 78u-4(a)(4), including the Memorandum of Points
4 and Authorities in Support thereof (collectively, the “Fee Motion” or ECF No. 261). In
5 consideration of the Fee Motion, and the February 2, 2023 Declaration of Jeffrey P. Campisi in
6 Support thereof and the exhibits attached thereto (ECF No. 262), and all other papers, pleadings,
7 and argument before the Court, **IT IS HEREBY ORDERED THAT:**

8 1. Lead Counsel is hereby awarded attorneys’ fees in the amount of \$ _____,
9 which is ___% of the Settlement Fund.

10 2. Lead Counsel shall be reimbursed \$ _____ for its Litigation Expenses from the
11 Settlement Fund.

12 3. Lead Plaintiff Julia Junge is awarded \$ _____ in lost wages under 15 U.S.C. §
13 78u-4(a)(4) from the Settlement Fund.

14 4. Lead Plaintiff Richard Junge is awarded \$ _____ in lost wages under 15 U.S.C. §
15 78u-4(a)(4) from the Settlement Fund.

16 **IT IS SO ORDERED.**

17 DATED: _____

HON. WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE