

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JESSE CROWELL, STEPHANIE  
GELBER, BENER SAKA, PETER  
NAU, ROBERT THOMPSON,  
KENNETH FORST, JASON FIGLEY,  
MIKE KWIATKOWSKI,  
CHRISTOPHER GITTINGS, and  
LONNIE HEETER, on behalf of  
themselves and all others similarly  
situated,

Case No. 1:23-cv-00013-MN

Plaintiffs,

v.

FCA U.S. LLC,

Defendant.

**ORDER GRANTING PLAINTIFFS' UNOPPOSED MOTION TO  
APPOINT INTERIM CLASS COUNSEL AND LIAISON COUNSEL**

THIS MATTER, having come before the Court by Plaintiffs Jesse Crowell, Stephanie Gelber, Bener Saka, Peter Nau, Lonnie Heeter, Robert Thompson, Kenneth Forst, Jason Figley, Mike Kwiatkowski, Christopher Gittings, and Lonnie Heeter in the above-captioned case by their Unopposed Motion to Appoint Interim Class Counsel and Liaison Counsel and supporting materials, and the Court being advised that Defendant FCA U.S. LLC does not oppose the relief sought in

Plaintiffs' motion, IT IS ORDERED that the Motion is GRANTED as set forth below:

1. The Court hereby appoints Nicholas Migliaccio and Jason Rathod of Migliaccio & Rathod LLP, David A. Goodwin and Noah L. Cozad of Gustafson Gluek PLLC, and Scott D. Hirsch of Scott Hirsch Law Group PLLC as interim class counsel in the above-captioned litigation, with the responsibilities set forth below:

a. Determine and present (in briefs, oral argument, or such other fashion as may be appropriate, personally or by a designee) to the Court and opposing parties the position of the Plaintiffs on all matters arising during pretrial proceedings;

b. Coordinate the initiation and conduct of discovery on behalf of Plaintiff and the putative Class consistent with the requirements of the Federal Rules of Civil Procedure;

c. Convene meetings amongst counsel;

d. Conduct settlement negotiations on behalf of Plaintiff and the putative Class;

e. Delegate tasks to other counsel in a manner to ensure that pretrial preparation for Plaintiff and the putative Class is conducted efficiently and effectively;

f. Negotiate and enter into stipulations with opposing counsel as necessary for the conduct and efficient advancement of the litigation;

g. Monitor the activities of all plaintiff's counsel to ensure that schedules are met and unnecessary expenditures of time and funds are avoided;

h. Perform such other duties as may be incidental to the proper

coordination of Plaintiff's pretrial activities or authorized by further order of the court;

i. Serve as the primary contact for communications between the Court and any other plaintiffs' counsel;

j. Ensure that all notices, orders, and material communications are properly distributed (to the extent that they are not otherwise served on Plaintiff's counsel *via* the Court's electronic filing system); and

k. Communicate with defense counsel as necessary to promote the efficient advancement of this litigation.

2. The Court hereby appoints P. Bradford deLeeuw of deLeeuw Law LLP as Interim Liaison Counsel in the above-captioned litigation, with the responsibilities set forth below:

a. Work in conjunction with interim class counsel to assist in coordination of meetings, discovery, litigation positions, and other tasks;

b. Ensure that Plaintiffs comply with all local rules and procedures governing the practice of law before this Court;

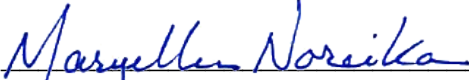
c. Maintain and distribute to co-counsel and to Defendants' liaison counsel an up to-date service list;

d. Receive and, as appropriate, distribute to co-counsel orders from the court and documents from opposing parties and counsel; and

e. Establish and maintain a document depository.

3. This Order shall apply to any action filed in, transferred to, or removed to this Court which relates to the subject matter at issue in this case.

IT IS SO ORDERED on this 7th day of September 2023.

  
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The Honorable Maryellen Noreika  
United States District Judge