

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
	:	MDL No. 1409
IN RE	:	
	:	
CURRENCY CONVERSION FEE	:	M 21-95
ANTITRUST LITIGATION	:	
	:	
_____	X	
THIS DOCUMENT RELATES TO:	:	Index No. 05 CV 7116 (WHP)
	:	
ROBERT ROSS, et al.,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
BANK OF AMERICA, N.A, (USA) et al.,	:	
	:	
Defendants.	:	
	:	
_____	X	

**JUDGMENT APPROVING ATTORNEYS' FEES AND COSTS,
AND THE DISBURSEMENT OF MONIES DESIGNATED FOR NOTICE COSTS
IN CONNECTION WITH THE SETTLEMENT AS TO DEFENDANT NATIONAL
ARBITRATION FORUM, INC.**

This Court having held a fairness hearing on _____, 201__, notice of the fairness hearing having duly been given in accordance with this Court's Order dated _____, 201__, the Court having considered all matters submitted to it at the fairness hearing and otherwise, and finding no just reason for delay in entry of this Judgment and good cause appearing therefore, hereby ORDERS that:

1. The definitions of any terms in the Settlement Agreement (defined below), filed with the Court on May 19, 2010, are incorporated by reference in this Judgment.

2. Subject to the Memorandum of Settlement with National Arbitration Forum, Inc. (the "Settlement Agreement"), the National Arbitration Forum, Inc. ("NAF") agreed to pay \$125,000 in attorneys' fees, expenses, and costs into an escrow account for this Litigation.

3. Pursuant to the Settlement Agreement, the NAF agreed that Notice expenses relating to this Settlement Agreement may be drawn from the \$125,000 in escrow. Of the \$125,000.00 advanced by the NAF, \$_____ was used by Plaintiffs' Co-Lead Counsel for the cost of notice and settlement administration. Thus, the sum of \$_____ currently remains in the escrow.

4. The Court hereby approves the payment to Plaintiffs' counsel of reasonable and appropriate attorneys' fees, expenses and costs, in the amount of \$_____. Upon entry of the Final Judgment and Order of Dismissal with Respect to Defendant National Arbitration Forum, Inc., Plaintiffs' Co-Lead Counsel Berger & Montague, P.C. is authorized to withdraw the remaining monies from the escrow, including the interest earned thereon.

5. Plaintiffs' Co-Lead Counsel Berger & Montague, P.C. shall allocate the monies paid for attorneys' fees and litigation expenses among all Plaintiffs' counsel based on Berger & Montague's reasonable assessment of the relative contributions of such counsel to the prosecution of the case on behalf of the Settlement Class.

6. Without affecting the finality of this Judgment in any respect, this Court reserves jurisdiction over any matters related to or ancillary to this Judgment.

7. Finding that there is no just reason for delay, this Judgment shall constitute a final judgment pursuant to Federal Rule of Civil Procedure Rule 54(b). The Clerk of the Court is directed to enter this Judgment on the docket forthwith.

Dated: _____
New York, New York

SO ORDERED:

The Honorable William H. Pauley, III
United States District Judge

Copies to:
All Counsel of Record