

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE NEW JERSEY TAX SALES CERTIFICATES ANTITRUST LITIGATION	Master Docket No. 3:12-CV-01893-MAS-TJB
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**[PROPOSED] ORDER GRANTING PLAINTIFFS’ MOTION TO
AUTHORIZE DISTRIBUTION OF THE SETTLEMENT FUND**

WHEREAS, Plaintiffs Gila Bauer as Trustee for the Gila Bauer Revocable Trust, Melissa Jacobs, Frances A. Schmidt and Donald W. Schmidt, and Son, Inc. (“Plaintiffs”) entered into settlement agreements with Defendants;¹

¹ The complete list of Defendants is: 1) CCTS Capital, LLC n/k/a Crestar Capital, LLC and William S. Green (collectively, Crestar Defendants); 2) American Tax Funding, LLC; 3) BBX Capital Corporation f/k/a BankAtlantic Bancorp, Inc., Fidelity Tax, LLC, Heartwood 55, LLC, Michael Deluca, Gary I. Branse, and David Jelley; 4) Richard Simon Trustee, Betty Simon Trustee and Joseph Wolfson; 5) Mooring Tax Asset Group, LLC and Lambros Xethalis; 6) Norman T. Remick; 7) Michael Mastellone; 8) Pat Caraballese and PAM Investors; 9) Robert U. Del Vecchio Sr. and Robert U. Del Vecchio Pension Trust; 10) CCTS, LLC, CCTS Tax Liens I, LLC, CCTS Tax Liens II, LLC, DSBBD, LLC, Pro Capital LLC, David Butler and David M. Farber; 11) Plymouth Park Tax Services, LLC; 12) M.D. Sass Investors Services, Inc., M.D. Sass Tax Lien Management, LLC, M.D. Sass Municipal Finance Partners – I, L.P., M.D. Sass Municipal Finance Partners – II, L.P., Sass Municipal Finance Partners – III, L.P., Sass Municipal Finance Partners – IV, L.P., Sass Municipal Finance Partners – V, L.P., Sass Municipal Finance Partners – VI, L.P. (collectively, “Sass Entities”), Vinaya K. Jessani and Stephen E. Hruby (collectively with the Sass Entities, “Sass Defendants”); 13) Robert E. Rothman; 14) Royal Bancshares of Pennsylvania, Inc., Royal Bank America, Crusader Servicing Corporation, and Royal Tax Lien Services, LLC; 15) William A. Collins; 16) Isadore H. May; 17) Burlington Assembly of God/Fountain of Life Center, Mercer S.M.E., Inc., Susan M. Esposito, and David B. Boudwin; 18) Richard J. Pisciotta, Jr.; 19) Phoenix Funding, Inc. and Benedict Caiola; and 20) Robert W. Stein.

WHEREAS, the Court preliminarily approved the settlements, certified the Settlement Class, appointed Settlement Class Counsel, and directed Settlement Class Counsel to issue notice of the proposed settlements to potential Settlement Class members;

WHEREAS, publication and mailing notice were issued;

WHEREAS, following a fairness hearing, the Court granted final approval to the settlements, approved the plan of allocation, and awarded attorneys' fees and expenses;

WHEREAS, the Net Settlement Fund to be distributed to class members is calculated after deduction of the Court-approved attorneys' fees and expenses, administrative expenses, taxes and tax expenses relating to the income earned by the settlement funds, and any other necessary adjustments under the Court's orders or the settlement agreements;

WHEREAS, Gilardi & Co, LLC ("Gilardi"), as the Court-approved Claims Administrator, has evaluated and audited claim forms from potential claimants and calculated the appropriate amount to be allocated to each qualified claimant;

NOW, upon consideration of Plaintiffs' Motion to Authorize Distribution of the Settlement Fund, it is hereby **ORDERED**:

1. The Motion is hereby **GRANTED**.
2. The Net Settlement Fund (\$6,447,970.63) shall be distributed to

Settlement Class members who have submitted valid claims, as determined by Gilardi, in the amounts shown on Exhibit G of the Supplemental Declaration of Kenneth Jue on Behalf of the Settlement Administrator, filed July 18, 2019.

IT IS SO ORDERED.

Dated: _____, 2019

Honorable Michael A. Shipp, U.S.D.J.