



GERMAN RUBENSTEIN LLP

October 9, 2015

**VIA FEDEX**

Honorable Esther Salas  
United States District Judge  
U.S. District Court for the District of New Jersey  
Martin Luther King Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Halley, et al. v. Honeywell International, Inc., et al.*; 2:10-cv-3345 (ES)(JAD)**

Dear Judge Salas:

We enclose Class Counsel's Documentation of Reasonably and Appropriately Incurred Costs in Further Support of Class Counsel's Motion Seeking an Award of Reasonable Costs, Attorneys' Fees and Incentive Awards.

We submit these records confidentially for *in camera* review pursuant to Letter Order dated September 25, 2015 (Doc. No. 428). As we previously explained to the Court (Doc. No. 397-2 at n. 5), each firm independently maintained and submits its own costs.

After careful review of these costs, Class Counsel has reduced our request for reimbursement to \$1,140,023.77 instead of \$1,191,174.67, as originally requested.<sup>1</sup> We respectfully request that the Court incorporate this modified request for reimbursement of costs into Class Counsel's Motion Seeking an Award of Reasonable Costs, Attorneys' Fees and Incentive Awards. Doc. No. 397.

Thank you for the Court's attention to this matter.

Respectfully submitted,



Steven J. German, Esq.  
*Counsel for Plaintiffs*

Encl.

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<sup>1</sup> As Class Counsel explained during the Fairness Hearing (Tr. 44), Class Counsel undertook before the Hearing – and has further undertaken since then – careful review of our costs to identify and correct any errors.