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Class Counsel

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

KIM ALLEN, LAINIE RIDEOUT, and
KATHLEEN HAIRSTON, on behalf of
themselves, all others similarly
situated, and the general public,

Plaintiffs,

v.

SIMILASAN CORPORATION,

Defendant.

CASE NO.: 3:12-cv-00376-BAS (JLB)
CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR ATTORNEYS' FEES,
COSTS, AND INCENTIVE AWARDS**

(HEARING DATE SET BY PRELIMINARY
APPROVAL ORDER [ECF NO. 258])

[Filed concurrently with Memorandum of Points
and Authorities; Marron Declaration; Dixon
Declaration; and Goetz Declaration]

Hearing: August 7, 2017
Time: 10:30 a.m.
Judge: Hon. Cynthia A. Bashant
Courtroom: 4B (4th Floor - Schwartz)

1 **PLEASE TAKE NOTICE** that on August 7, 2017 at 10:30 a.m., or as soon
2 thereafter as it may be heard, in Courtroom 4B before the Honorable Cynthia A. Bashant of
3 the United States District Court for the Southern District of California, located at 221 West
4 Broadway, San Diego, California 92101, Plaintiffs/Class Representatives Lainie Rideout
5 and Kathleen Hairston will, and hereby do, move this Court for an Order granting their
6 request for:

- 7 1. An award of attorneys’ fees to Class Counsel in the amount of \$175,000.00;
- 8 2. An award of reimbursed expenses to Class Counsel in the amount of
9 \$102,544.12—consisting of \$71,683.13 for the Law Offices of Ronald A. Marron,
10 APLC; \$30,139.23 for Gomez Trial Attorneys; and \$721.76 for the Goetz Firm,
11 LLC; and
- 12 3. Incentive awards to Class Representatives Lainie Rideout and Kathleen Hairston
13 in the amount of \$2,500.00 each for their time and effort in this Litigation.

14 This Motion is based on this Notice, the accompanying Memorandum of Points and
15 Authorities, the accompanying Declarations of Ronald A. Marron, Deborah Dixon, and Dean
16 Goetz, and all attached Exhibits thereto, all of the files and records of this action, and on any
17 additional material that may be elicited at the hearing of this motion, for which Plaintiffs are
18 requesting oral argument.

19 Dated: June 23, 2017

Respectfully submitted,

20
21 /s/ Ronald A. Marron
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