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Superior Court of California,
County of Los Angeles
9/28/2023 5:22 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By G. Carini, Deputy Clerk

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10 *Attorneys for Plaintiff,*
Jennifer Goodwin

11 **SUPERIOR COURT OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES – UNLIMITED CIVIL**

13 JENNIFER GOODWIN, individually
and on behalf of all others similarly
14 situated,

15 Plaintiff,

16 v.

17 K M P Enterprises d/b/a Powell Electric,

18 Defendant.

Case No.: 20STCV18428

**NOTICE OF MOTION AND
PLAINTIFF’S MOTION FOR
ATTORNEYS’ FEES, COSTS AND
SERVICE AWARD**

Date: January 16, 2024

Time: 10:00 a.m.

Department: 14

Judge: Hon. Kenneth R. Freeman

Complaint Filed: May 14, 2020



1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that the Jennifer Goodwin (“Plaintiff”) will and hereby does
3 move for attorneys’ fees, costs and service award in this preliminary approved class action
4 settlement, pursuant to Sections 2.6-2.8 of the Settlement Agreement and Cal. Civ. Proc. Code §
5 1021.5, on **January 16, 2024,² at 10:00 a.m.**, at the Superior Court of California, County of Los
6 Angeles, at the Spring Street Courthouse located at 312 N. Spring St., Los Angeles, California
7 90012, Department 14.

8 Specifically, Plaintiff seeks \$570,000 as attorneys’ fees, litigation costs of \$17,440.77 (and
9 up to \$25,000), a service award of \$4,000, and estimated class notice and administration expenses
10 of \$70,437.00, all paid from the Common Fund of \$1,900,000.

11 This motion is based on this Notice, the Memorandum of Points and Authorities, the
12 Declarations and Exhibits thereto, the First Amended Complaint, the complete files and records in
13 this action, and any evidence that may be presented at the hearing.

14
15 Dated: September 28, 2023

Respectfully Submitted,

16 **KAZEROUNI LAW GROUP, APC**

17 By: /s Abbas Kazerounian
18 Abbas Kazerounian, Esq.
19 *Attorneys for Plaintiff*

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26 _____
27 ² January 16, 2024 is the date of the Final Approval Hearing. *See* Order (1) Conditionally
28 Certifying a Settlement Class, (2) Preliminarily Approving Class Action Settlement, (3)
Approving Notice Plan, and (4) Scheduling Final Approval Hearing, issued on July 25, 2023.