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Electronically FILED by
Superior Court of California,
County of Los Angeles
7/20/2023 6:58 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By S. Drew, Deputy Clerk

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11 **Attorneys for Plaintiff**

12 [Additional Counsel on Signature Page]

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

16 JOHN DOE, on behalf of himself and all others
17 similarly situated and for the benefit of the
18 general public,

19 Plaintiff,

20 v.

21 CALIFORNIA DEPARTMENT OF PUBLIC
22 HEALTH, *et al.*,

23 Defendants.

Case No. 20STCV32364

*[Assigned to the Hon. Lawrence P. Riff in
Dept. 7 of Spring Street Courthouse]*

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, ORDER APPROVING
PAYMENT OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES, AND
PAYMENT TO THE CLASS
REPRESENTATIVE**

Final Approval Hearing Scheduled Per May 19,
2023 Preliminary Approval Order:

Hearing Date: August 25, 2023

Time: 10:00 a.m.

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1 TO ALL CLASS MEMBERS, PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that at 10:00 a.m. on August 25, 2023 in Department 7 of the Los
3 Angeles County Superior Court, located at 312 N. Spring Street, Los Angeles, CA 90012, in compliance
4 with the Court’s Updated Order Granting Plaintiff’s Unopposed Motion for Preliminary Approval of
5 Settlement; Certification of Settlement Class; and Qualified Protective Order, dated May 19, 2023,
6 Plaintiff John Doe and Co-Lead Class Counsel will move this Court for entry of an Order Granting Final
7 Approval of Class Action Settlement, and for an Order Approving Payment of Attorneys’ Fees and
8 Reimbursement of Expenses, and Payment to the Class Representative (“Motion”).

9 This Motion is made pursuant to California Rules of Court, rule 3.769, which requires this Court
10 to conduct an inquiry into the fairness of the proposed settlement, including payment of attorneys’ fees
11 and reimbursement of expenses and payment to a class representative for services rendered. For the
12 reasons detailed in the accompanying papers, the Settlement negotiated by the Parties and preliminarily
13 approved by the Court is fair, reasonable, and adequate, and thus the Court should enter an order granting
14 final approval of Plaintiff’s proposed settlement with Defendants, approving payment of an award to
15 Class Representative John Doe, and payment of attorneys’ fees and reimbursement of expenses to Co-
16 Lead Class Counsel as agreed to by the Parties.

17 This Motion is based upon the accompanying Memorandum of Points and Authorities in Support
18 of Motion for Final Approval of Class Action Settlement; Memorandum of Points and Authorities in
19 Support of Motion for Order Approving Payment of Attorneys’ Fees and Reimbursement of Expenses,
20 and Payment to the Class Representative; the Declarations of Jerry Flanagan, Daniel L. Sternberg,
21 Alan M. Mansfield, and accompanying exhibits; the pleadings and records on file, including the
22 information submitted as part of Plaintiff’s Unopposed Motion for Preliminary Approval of Settlement,
23 Certification of Settlement Class, and Qualified Protective Order; and the information referenced in those
24 papers and accompanying exhibits, and any argument or evidence that may be presented at the hearing
25 on this matter.

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1 Dated: July 20, 2023

Respectfully Submitted,

2 CONSUMER WATCHDOG

3
4 By: 

Jerry Flanagan
Daniel L. Sternberg

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27 *Attorneys for Plaintiffs*

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PROOF OF SERVICE
State of California, County of Los Angeles

I am employed in the City and County of Los Angeles in the State of California. I am over the age of 18 years and not a party to the within action. My business address is 6330 San Vicente Boulevard, Suite #250, Los Angeles, California 90048, and I am employed in the city and county where this service is occurring.

On July 20, 2023, I caused service of true and correct copies of the documents entitled
NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ORDER APPROVING PAYMENT OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES, AND PAYMENT TO THE CLASS REPRESENTATIVE
upon the persons named in the attached service list, in the following manner:

SEE ATTACHED LIST

(BY EMAIL OR ELECTRONIC SERVICE) Per the Court's Order dated October 22, 2020 authorizing electronic service, I caused the above-entitled document to be served through Case Anywhere addressed to all parties appearing on the Case Anywhere electronic service list for the above-entitled case.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 20, 2023, at Los Angeles, California.



Kaitlyn Gentile

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Service List

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