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Attorneys for Plaintiff TAMARA WHITMER, in a Representative capacity, and on behalf of the proposed class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

TAMARA WHITMER, in a Representative
capacity, and on behalf of the proposed class

CASE NO. 20CHCV00209

Plaintiff,

**NOTICE OF PLAINTIFF'S UNOPPOSED
MOTION FOR FINAL APPROVAL OF (1)
CLASS ACTION SETTLEMENT; (2)
ATTORNEYS' FEES AND COSTS; and (3)
CLASS REPRESENTATIVE AWARD**

v.

USP MISSION HILLS, INC., a California
Corporation, and DOES 1-10, inclusive

Date: March 23, 2023
Time: 10:00 a.m.
Dept.: 11
Judge: Hon. David S. Cunningham

Defendants

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1 TO ALL PARTIES HEREIN AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on March 23, 2023, at 10:00 a.m. or as soon thereafter as the
3 matter may be heard in Department 11 of the above-entitled court, located at 312 N Spring St, Los
4 Angeles, CA 90012, the Honorable David S. Cunningham presiding, Plaintiff TAMARA WHITMER,
5 Individually and on behalf of the certified classes will and hereby does move this Court for final
6 approval of a class action settlement, approval of attorneys fees and costs, and approval of the class
7 representative enhancement award.

8 The **unopposed** motion is based upon this Notice, the Memorandum of Points and Authorities
9 in support thereof, the declaration of Eric K. Yaeckel, the declaration of Settlement Administrator
10 Taylor Mitzner, the Proposed Order and Judgment, all other papers filed in this action, and upon such
11 other evidence and argument at the hearing.

12 **Please Note:** Given the multiplicity of issues addressed in this Motion, Plaintiff has expressed
13 a need to exceed the 15-page limit set forth in California Rule of Court 3.1113(d), and Defendant does
14 not oppose Plaintiffs' request for additional pages. Therefore, Plaintiffs request the Court's
15 consideration of Plaintiffs' memorandum of points and authorities which is 18 pages in length.
16 Moreover, as the motion is unopposed, there will be no Opposition nor a Reply.

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18 Dated: March 1, 2023

SULLIVAN & YAECKEL LAW GROUP, APC

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21 Eric K. Yaeckel
22 Attorneys for Plaintiff TAMARA WHITMER, in a
23 Representative capacity only, and on behalf of other
24 members of the general public similarly situated
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