

JAMES HAWKINS APLC

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Attorneys for Plaintiff KAYLA MILLIGAN,
individually and on behalf of all other similarly
situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

KAYLA MILLIGAN, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

CWI, Inc. d/b/a Camping World, a
Kentucky Corporation; and DOES 1-50,
inclusive

Defendants.

CASE NO. CIVDS2020159

Assigned to the Hon. David Cohn

CLASS ACTION

**NOTICE OF MOTION AND MOTION FOR
AWARD OF ATTORNEYS' FEES, COSTS,
AND CLASS REPRESENTATIVE
INCENTIVE AWARDS**

Preliminary Approval Date: May 2, 2022
Final Approval Hearing: September 7, 2022
Time: 10:00 a.m.

Action Filed: September 21, 2021

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on September 7, 2022 at 10:00 a.m. in Department S-26 of the San Bernardino Superior Court located at 247 West Third Street, San Bernardino, CA 92415, the Honorable David Cohn presiding, Plaintiff Kayla Milligan (“Plaintiff”) will and hereby does move this Court for an order awarding (a) Class Counsel’s attorneys’ fees in the amount of \$500,000.00 and litigation costs of \$14,624.27 (Preliminarily Approved up to \$30,000); and (b) an incentive award in the amount of \$10,000 to Plaintiff as Class Representative.

This motion is based on the Memorandum of Points and Authorities in support of the Motion for Attorneys’ Fees, Costs, and Class Representative Incentive Awards; the Declaration of James R. Hawkins; the Declaration of Makenna Snow of ILYM Group; the Declaration of Plaintiff Kayla Milligan submitted in support of Final Approval; the Proposed Order Granting Final Approval of Class Action and PAGA Settlement and Judgement; all documents currently on file in this action including without limitation those submitted in support of the Motion for Preliminary Approval of Class Action Settlement; the arguments of counsel; and such other and further evidence as the Court may choose to entertain.

This motion is set to be heard concurrently with Plaintiffs’ Motion for Final Approval of Class Action Settlement (“Final Approval Motion”).

Dated: August 15, 2022

JAMES HAWKINS APLC

By: 
James R. Hawkins
Christina M. Lucio

Attorneys for Plaintiff and the
Conditionally Certified Class

PROOF OF SERVICE, COUNTY OF ORANGE

I am a resident of the State of California, County of Orange. I am over the age of eighteen years and not a party to the within action. My business address is 9880 Research Drive., Suite 200, Irvine, California 92618.

On August 15, 2022, I served on the interested parties in this action the following document(s) entitled:

- **NOTICE OF MOTION AND MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS, AND CLASS REPRESENTATIVE INCENTIVE AWARDS**
- **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEYS' FEES, COSTS, AND ENHANCEMENT**
- **DECLARATION OF JAMES R. HAWKINS IN SUPPORT OF (1) PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND (2) MOTION FOR ATTORNEYS' FEES, COSTS AND CLASS REPRESENTATIVE ENHANCEMENT AWARD**
- **DECLARATION OF KAYLA MILLIGAN IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND MOTION FOR ATTORNEYS' FEES, COSTS AND CLASS REPRESENTATIVE ENHANCEMENT AWARD**
- **DECLARATION OF MAKENNA SNOW OF ILYM GROUP, INC., IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**
- **[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

[XX] BY ELECTRONIC SERVICE: Based on a court Order or an agreement by the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from the email address Nicole@jameshawkinsaplc.com to the persons at the e-mail addresses listed in the Service List below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

SERVICE LIST

REBECCA ARAGON, Bar No. 134496 Raragon@littler.com HOVANNES G. NALBANDYAN, Bar No. 300364 Hnalbandyan@littler.com LAURA E. SCHNEIDER, Bar No. 326077 Lschneider@littler.com Michele Morelli MMorelli@littler.com Sarah Fleming SAFleming@littler.com LITTLER MENDELSON, P.C. 633 W. Fifth Street, 63rd Floor Los Angeles, CA 90071 Attorneys for Defendant CWI, Inc. d/b/a Camping World	<u>Via LWDA Website</u> Labor and Workforce Development Agency Attn: PAGA Administrator 1515 Clay Street, Ste 801 Oakland, CA 94612 http://www.dir.ca.gov/Private-Attorneys-General-Act
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[XX] **STATE:** I declare under penalty of perjury, under the laws of the State of California, that the above is true and correct.

Executed on August 15, 2022, at Irvine, California



Nicole Miccolis