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Attorneys for Plaintiff SCOTT CAHN,
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

SCOTT CAHN, individually and on behalf
of himself and all others similarly situated,

Plaintiff,

v.

J.J.R. ENTERPRISES, INC., doing
business as CALTRONICS BUSINESS
SYSTEMS, a California Corporation; and
DOES 1-50, inclusive,

Defendants.

Case No. 34-2020-00284704

Assigned for All Purposes to:

Hon. Lauri A. Damrell

Dept.: 28

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR AWARD OF ATTORNEYS'
FEES AND COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT**

Date: January 26, 2024

Time: 9:00 a.m.

Dept.: 28

**TO DEFENDANT J.J.R. ENTERPRISES, INC. DBA CALTRONICS BUSINESS
SYSTEMS, AND TO ITS ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE THAT on January 26, 2024 at 9:00 a.m., or as soon thereafter as the matter may be heard, in Department 28 of the above-captioned court, located at the Gordon D. Schaber Sacramento County Courthouse, 4th floor, 720 9th St, Sacramento, CA 95814, before the Honorable Lauri A. Damrell, Plaintiff Scott Cahn (“Plaintiff”), individually, and on behalf of the members of the putative class they seek to represent, will and hereby do move this Court for an order awarding (a) Class Counsel’s attorneys’ fee in the amount of \$141,666.67 and actual and anticipated litigation costs of \$12,089.63; and (b) Class Representative Enhancement Payment in the amount of \$10,000.00 to Plaintiff.

This motion is based on the Memorandum of Points and Authorities in support of the Motion for Attorneys’ Fees, Costs, and Class Representative Enhancement Payment; the Declaration of James R. Hawkins in Support of Final Approval; the Declaration of Scott Cahn in Support of Final Approval; the Declaration of Jarrod Salinas on Behalf of Phoenix Settlement Administrators; the Proposed Order Granting Final Approval of the Stipulation of Settlement and Judgement; the Declaration of James R. Hawkins In Support of Preliminary Approval; all documents currently on file in this action including without limitation those submitted in support of the Motion for Preliminary Approval of Stipulation of Settlement and Motion for Final Approval of Stipulation of Settlement; the arguments of counsel; and such other and further evidence as the Court may choose to entertain.

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1 This motion is set to be heard concurrently with Plaintiff's Motion for Final Approval of
2 the Stipulation of Settlement.

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4 Dated: January 03, 2024

Respectfully Submitted:

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6 **JAMES HAWKINS, APLC**

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8 By: _____



James R. Hawkins
Christina M. Lucio

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10 Attorneys for Plaintiff Scott Cahn
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