

Carolyn H. Cottrell (SBN 166977)
Esther L. Bylsma (SBN 264208)
SANDRA ACOSTA TELLO (SBN 315616)
SCHNEIDER WALLACE
COTTRELL KIM LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608
Tel: (415) 421-7100
Fax: (415) 421-7105
ccottrell@schneiderwallace.com
ebylsma@schneiderwallace.com

Edwin Aiwazian (SBN 232943)
LAWYERS FOR JUSTICE
410 West Arden Avenue, Suite 203
Glendale, CA 91203
Tel: (818) 265-1020
Fax: (818) 265-1021
edwin@calljustice.com

Attorneys for Plaintiff

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN MATEO

LUIS R. CHAVARRIA RAMIREZ,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiff,

v.

PROSPECT INTERNATIONAL AIRPORT
SERVICES CORPORATION, a Nevada
corporation; PROSPECT AIRPORT
SERVICES, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21-CIV-03392

[Consolidated with Case No. 21-CIV-03393]

**PLAINTIFF'S NOTICE OF RENEWED
MOTION AND MOTION FOR AN
AWARD OF ATTORNEY'S FEES AND
COSTS AND INCENTIVE AWARD**

Date: July 29, 2025

Time: 2:00 p.m.

Dept: 4

FAC Filed: January 10, 2024

Jury Trial Date: None Set

1 **TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on July 29, 2025, at 2:00 p.m., in Department 4 of this Court,
3 Plaintiff Luis R. Chavarria Ramirez (Plaintiff") will and hereby does move this Court for an Order as
4 follows:

5 1. Awarding Class Counsel reasonable attorneys' fees of 35% of the Gross Settlement
6 Amount (assuming the escalator is not triggered, \$647,500.00), plus reimbursement of actual out of
7 pocket costs of \$21,657.40. Class Counsel's fee request is well within the range of attorneys' fee
8 awarded to plaintiff's counsel in comparable wage and hour class actions in the California courts and
9 supported by numerous relevant factors. Class Counsel's out-of-pocket costs are documented,
10 reasonable and recoverable under applicable law as well.

11 2. Granting Named Plaintiff a service award in the amount of \$15,000 for his services on
12 behalf of the Class.

13 This Motion is based on the accompanying Memorandum of Points and Authorities; the
14 Declaration of Esther L. Bylsma; the Declaration of Vartan Madoyan; the Declaration of Plaintiff Luis
15 R. Chavarria Ramirez; such oral argument as may be heard by the Court; and all other papers on file in
16 this action.

17 DATE: July 15, 2025

SCHNEIDER WALLACE
COTTRELL KIM LLP

19 By:



20 Carolyn H. Cottrell
21 Esther L. Bylsma
22 Sandra Acosta Tello
23 SCHNEIDER WALLACE
24 COTTRELL KIM LLP
25 2000 Powell Street, Suite 1400
26 Emeryville, California 94608
27 Tel: (415) 421-7100
28 Fax: (415) 421-7105

Edwin Aiwanian
LAWYERS FOR JUSTICE
410 West Arden Avenue, Suite 203
Glendale, CA 91203
Ph: (818) 265-1020
Fax: (818) 265-1021

Attorneys for Plaintiff