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Attorneys for Plaintiff JULIO C. ROVIRA,
On behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

JULIO C. ROVIRA, individually and on
behalf of himself and all others similarly
situated,

Plaintiff,

vs.

SILVERADO SENIOR LIVING
MANAGEMENTS, INC., a Delaware
Corporation, and DOES 1-50, inclusive,

Defendants.

Case No. 30-2020-01136565-CU-OE-CXC

Assigned for All Purposes To:

Hon. Lon F. Hurwitz

Dept.: CX-103

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR AWARD OF
ATTORNEYS' FEES AND COSTS, AND
CLASS REPRESENTATIVE SERVICE
AWARD**

Date: February 24, 2023

Time: 1:30 p.m.

Dept: Dept. CX-103

Date Action Filed: March 5, 2020

Trial Date: N/A

1 **TO DEFENDANT SILVERADO SENIOR LIVING MANAGEMENT, INC. AND TO ITS**
2 **ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE THAT** on February 24, 2023 at 1:30 p.m., or as soon
4 thereafter as the matter may be heard, in Department CX-103 of the above-captioned court,
5 located at Civil Complex Center 751 West Santa Ana Blvd., California 92701, before the
6 Honorable Lon F. Hurwitz, Plaintiffs Julio C. Rovira, Lorena Renteria, and Virgilio Santos,
7 individually, and on behalf of the members of the putative class they seek to represent, will and
8 hereby do move this Court for an order awarding (a) Class Counsel's attorneys' fee in the
9 amount of \$250,000.00 and litigation costs of \$14,813.91; and (b) Class Representative Service
10 Awards in the amount of \$7,500.00 to Plaintiff Rovira and \$2,500.00 each to Plaintiffs Renteria
11 and Santos.

12 This motion is based on the Memorandum of Points and Authorities in support of the
13 Motion for Attorneys' Fees, Costs, and Class Representatives Service Award; the Declaration of
14 James R. Hawkins; the Christina M. Lucio; the declarations of the Class Representatives Julio
15 Rovira, Lorena Renteria, and Virgilio Santos; the Declaration of Cassandra Polites on Behalf of
16 ILYM Group, Inc.; the Proposed Order Granting Final Approval of Class Action Settlement and
17 Judgement; all documents currently on file in this action including without limitation those
18 submitted in support of the Motion for Preliminary Approval of Class Action and PAGA
19 Settlement and Motion for Final Approval of Class Action and PAGA Settlement; the arguments
20 of counsel; and such other and further evidence as the Court may choose to entertain.

21 This motion is set to be heard concurrently with Plaintiffs' Motion for Final Approval of
22 Class Action and PAGA Settlement.
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1 Dated: February 1, 2023

Respectfully Submitted,

2 James Hawkins, APLC

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4 By: Christina M. Lucio /

James R. Hawkins

5 Christina M. Lucio

6 Attorneys for Plaintiffs and the Class