

ERIC A. GROVER (SBN 136080)
eagrover@kellergrover.com
ROBERT W. SPENCER (SBN 238491)
rspencer@kellergrover.com

KELLER GROVER LLP
1965 Market Street
San Francisco, California 94103
Telephone: (415) 543-1305
Facsimile: (415) 543-7861

Attorneys for Plaintiff
KAYLYN BUSH and MADELEINE GUEVARA

[Additional Counsel on Next Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MERCED**

KAYLYN BUSH and MADELEINE
GUEVARA, on behalf of themselves, and all
aggrieved employees,

Plaintiffs,

v.

DUTCH BROS., LLC; and DOES 1 through
100, inclusive,

Defendants.

Case No: 22CV-01415

REPRESENTATIVE ACTION

*Assigned for all purposes to the
Hon. Brian McCabe, Dept. 8*

**NOTICE OF MOTION AND MOTION
FOR AN ORDER AWARDING
ATTORNEYS' FEES, COSTS,
ENHANCEMENT PAYMENT, AND
SETTLEMENT ADMINISTRATION FEES**

Date: December 13, 2023

Time: 8:15 a.m.

Dept. 8

Complaint filed: May 19, 2022

Trial Date: TBD

1 JOSEPH LAVI (SBN 209776)
2 jlavi@lelawfirm.com
3 VINCENT C. GRANBERRY (SBN 276483)
4 vgranberry@lelawfirm.com
5 COURTNEY M. MILLER (SBN 327850)
6 cmiller@lelawfirm.com
7 whits@lelawfirm.com
8 **LAVI & EBRAHIMIAN, LLP**
9 8889 W. Olympic Boulevard, Suite 200
10 Beverly Hills, California 90211
11 Telephone: (310) 432-0000
12 Facsimile: (310) 432-0001
13
14 Attorneys for Plaintiffs
15 KAYLYN BUSH and MADELEINE GUEVARA
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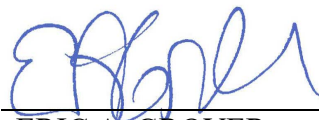
1 **PLEASE TAKE NOTICE THAT** on December 13, 2023 at 8:15 a.m., or as soon
2 thereafter as the matter may be heard, in Department 8 of the above-entitled Court, located at Old
3 Merced Courthouse, 627 West 21st Street, Merced, California 95340, Kaylyn Bush and
4 Madeleine Guevara (“Plaintiffs”), will and hereby do move unopposed for an Order awarding
5 payment of attorneys’ fees and litigation costs in the amount of \$667,574.99 to Plaintiffs’
6 Counsel, payment of enhancement awards in the amount of \$10,000 each to Plaintiffs Bush
7 and Guevara, and payment for settlement administration fees in the amount of \$17,500 to
8 Simpluris, Inc.

9 This motion will be based on this Notice, the supporting memorandum of points and
10 authorities, the Parties’ Labor Code Private Attorneys General Act Settlement Agreement,
11 the Declarations of Eric A. Grover, Vincent Granberry, Kaylyn Bush, and Madeleine Guevara,
12 the documents and records on file in this matter, and such additional arguments, authorities,
13 and evidence and other matters as may be presented by the Parties hereafter.

14
15 Dated: October 25, 2023

KELLER GROVER LLP

16
17 By: _____



ERIC A. GROVER
ROBERT SPENCER
Counsel for Plaintiffs
KAYLYN BUSH AND MADELEINE
GUEVARA

PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On October 27 2023, in the case of *Bush, et al., v. Dutch Bros., LLC, et al.*, Merced Superior Court Case Number 22CV-01415, I served the foregoing document(s):

NOTICE OF MOTION AND MOTION FOR AN ORDER AWARDING ATTORNEYS' FEES, COSTS, ENHANCEMENT PAYMENT, AND SETTLEMENT ADMINISTRATION FEES

on the interested party(ies) below, using the following means:

Robert J. Wilger, Esq. *Attorneys for Defendant*
Benjamin A. Emmert, Esq. **DUTCH BROS., LLC**
Melinda Ward

LITTLER MENDELSON, P.C.
50 West San Fernando Street, 7th Floor
San Jose, California 95113
RWilger@littler.com
BEmmert@littler.com
MWard@littler.com

Joseph Lavi *Attorneys for Plaintiff*
Vincent C. Granberry **MADELINE GUEVARA**
Courtney M. Miller
LAVI & EBRAHIMIAN, LLP
8889 W. Olympic Boulevard, Suite 200
Beverly Hills, California 90211
Telephone: (310) 432-0000
Facsimile: (310) 432-0001
jlavi@lelawfirm.com
vgranberry@lelawfirm.com
cmiller@lelawfirm.com
whts@lelawfirm.com

☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


JOEY GONZALEZ