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Attorneys for Plaintiff
ANDREA PRIOR

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

ANDREA PRIOR on behalf of herself, and all
aggrieved employees,

Plaintiff,

v.

ADVENTIST HEALTH CLEARLAKE
HOSPITAL, INC.; and DOES 1 through 10,
inclusive,

Defendants.

Case No: CV 423216

REPRESENTATIVE ACTION

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

Date: August 19, 2024

Time: 9:00 a.m.

Dept. 1

Complaint filed: October 21, 2022

Trial: Not set

1 **PLEASE TAKE NOTICE THAT** on August 19, 2024 at 9:00 a.m., or as soon thereafter
2 as the matter may be heard, in Department 1 of the above-entitled Court, located at 255 North
3 Forbes Street, Lakeport, California 95453, Plaintiff Andrea Prior (“Plaintiff”), will and hereby
4 does move unopposed for an Order awarding payment of attorneys’ fees in the amount of
5 \$166,667 and litigation costs in the amount of \$15,721.16 to Plaintiff’s Counsel, payment of a
6 enhancement award in the amount of \$7,500 to the representative PAGA Plaintiff, and payment
7 for settlement administration fees of up to \$7,500 to Simpluris, Inc.

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

13
14 Dated: July 19, 2024

KELLER GROVER LLP

15
16 By: _____



ERIC A. GROVER
ROBERT SPENCER
Counsel for Plaintiff
Andrea Prior

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 July 19, 2024, in the case of *Andrea Prior v. Adventist Health Clearlake Hospital, Inc.*, Lake County Superior Court Case Number CV 423216, 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:

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☒	(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