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Attorneys for Plaintiff  
GUADALUPE HERNANDEZ

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

GUADALUPE HERNANDEZ, on behalf of  
himself, and all others similarly situated,

Plaintiff,

v.

AUTOMATED HARVESTING, LLC; and  
DOES 1 through 50, inclusive,

Defendants.

Case No: 22CV002717

REPRESENTATIVE ACTION

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

[Assigned for all purposes to The Honorable  
Thomas A. Wills, Dept. 15]

Date: November 17, 2023

Time: 10:00 a.m. (matter will trail to end of  
8:30 a.m. calendar)

Dept. 15

Complaint filed: September 13, 2022

FAC Filed: November 15, 2022

SAC Filed: December 20, 2022

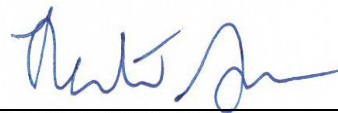
**PLEASE TAKE NOTICE THAT** on November 17, 2023 at 10:00 a.m. (please take note that this matter will trail to end of 8:30 a.m. calendar), or as soon thereafter as the matter may be heard, in Department 15 of the above-entitled Court, located at 1200 Aguajito Road, Monterey, California 93940, Plaintiff Guadalupe Hernandez (“Plaintiff”), will and hereby does move unopposed for an Order awarding payment of attorneys’ fees and litigation costs in the amount of \$148,916.81 to Plaintiff’s Counsel, payment of a service payment in the amount of \$5,000 to Plaintiff Guadalupe Hernandez, and payment for settlement administration fees in the amount of \$6,500 to Simpluris, Inc.

This motion will be based on this Notice, the supporting memorandum of points and authorities, the Parties’ Labor Code Private Attorneys General Act Settlement Agreement, the Declarations of Robert Spencer and Guadalupe Hernandez, the documents and records on file in this matter, and such additional arguments, authorities, and evidence and other matters as may be presented by the Parties hereafter.

Dated: October 10, 2023

**KELLER GROVER LLP**

By: \_\_\_\_\_



ERIC A. GROVER  
ROBERT SPENCER  
*Counsel for Plaintiff*  
GUADALUPE HERNANDEZ

**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 10, 2023, in the case of *Hernandez v. Automated Harvesting, LLC, et al.*, Monterey Superior Court Case Number 22CV002717, I served the foregoing document(s):

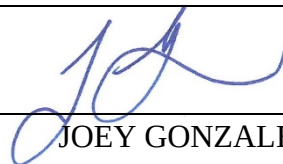
**NOTICE OF MOTION AND MOTION FOR AN ORDER AWARDING ATTORNEYS' FEES, COSTS, ENHANCEMENT PAYMENT, AND SETTLEMENT ADMINISTRATION FEES**

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

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*Attorneys for Defendant*  
**AUTOMATED HARVESTING, LLC**

|                                     |                                                                                                                                                                                                                                                   |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | (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. |
| <input checked="" type="checkbox"/> | (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.                                                                                                                          |

  
\_\_\_\_\_  
JOEY GONZALEZ