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Attorneys for Plaintiffs Efrain J. Sanchez, Alejandro Ruiz,
and Luis Franco on behalf of themselves and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

EFRAIN J. SANCHEZ, individually and on
behalf of others similarly situated,

Plaintiffs,

v.

GRUPO DECO CALIFORNIA
CORPORATION, a California Corporation;
GRUPO DECO AMERICA
CORPORATION, a Delaware Corporation;
and DOES 1-50, inclusive,

Defendants.

Case No. BC526934

Honorable Kenneth R. Freeman

**NOTICE OF MOTION AND MOTION
FOR AWARD OF ATTORNEYS' FEES,
COSTS, AND CLASS
REPRESENTATIVE INCENTIVE
AWARDS**

Complaint Filed: November 6, 2013

Date: June 21, 2022

Time: 10:00 a.m.

Dept.: 14

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

2 **PLEASE TAKE NOTICE** that on June 21, 2022 at 10:00 a.m. in Department 14 of this
3 Court, located at Los Angeles Superior Court –Spring Street Courthouse, 312 North Spring
4 Street, Los Angeles, California 90012, or as soon thereafter as this matter can be heard, Plaintiffs
5 Efrain J. Sanchez, Alejandro Ruiz and Luis Franco (“Plaintiffs”) will and hereby do move this
6 Court for an order awarding (a) Class Counsel’s attorneys’ fees in the amount of \$26,666.67 and
7 litigation costs of \$15,000; and (b) an incentive award in the amount of \$2,500 to each Plaintiff
8 (total of \$7,500) as Class Representative.

9 This motion is based on the Memorandum of Points and Authorities in support of the
10 Motion for Attorneys’ Fees, Costs, and Class Representative Incentive Awards; the Declaration
11 of James R. Hawkins; the Declaration of Nathalie Hernandez of ILYM Group, Inc.; the
12 Declarations of Efrain J. Sanchez, Alejandro Ruiz and Luis submitted in connection with
13 Preliminary Approval; the Proposed Order Granting Final Approval of Class Action Settlement
14 and Judgement; all documents currently on file in this action including without limitation those
15 submitted in support of the Motion for Preliminary Approval of Class Action Settlement; the
16 arguments of counsel; and such other and further evidence as the Court may choose to entertain.

17 This motion is set to be heard concurrently with Plaintiff’s Motion for Final Approval of
18 Class Action Settlement (“Final Approval Motion”).

19 Dated: May 23, 2022

JAMES HAWKINS APLC

21 By:



22 James R. Hawkins
23 Christina M. Lucio

24 Attorneys for Plaintiffs and the
25 Conditionally Certified Class
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