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Attorneys for Plaintiff
JIHYUN KWON

SUPERIOR COURT OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

JIHYUN KWON, as an individual on behalf of
herself and on behalf of all others similarly
situated,

Plaintiff,

v.

WOOLTARI USA, INC., a Delaware
corporation; and DOES 1-100, inclusive,

Defendants.

Case No. 22STCV37161

Assigned for All Purposes to:
Hon. Lauren A. Seigle
Dept. SSC-17

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND REQUEST FOR
ATTORNEY'S FEES AND COSTS**

[Filed concurrently with Memorandum of
Points & Authorities; Declarations of Nikki
Trenner and Nicole Branch; [Proposed]
Order]

Date: January 3, 2025
Time: 9:00 a.m.
Dept.: SSC-17

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2 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

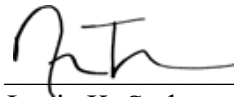
3 PLEASE TAKE NOTICE THAT on January 3, 2025, at 9:00 a.m., or as soon thereafter as
4 the matter may be heard, in Department 17 of the above-entitled Court, located at 312 N. Spring
5 St., Los Angeles, California, Plaintiff Jihyun Kwon, on behalf of herself and the conditionally
6 certified settlement class, will and hereby does move the Court for an order granting final
7 approval of the proposed class action settlement, approving the payment of civil penalties, and
8 approving payment of the Settlement Administrator's fees and expenses. Plaintiff also will and
9 hereby does move the Court for an order granting an award of attorney's fees in the amount of
10 \$100,000.00 (33.33% of the escalated gross settlement amount) and costs in the amount of
11 \$14,700.00, as provided in the proposed class action settlement.

12 This motion is brought under California Rule of Court 3.769, on the grounds that the
13 settlement is fair, reasonable and adequate and in the best interests of the class, and meets all
14 requirements for class certification. The requested attorney's fees and costs are fair and
15 reasonable under the circumstances of the case.

16 The motion will be based upon this notice of motion and motion, the accompanying
17 memorandum of points and authorities, declarations of Nikki Trenner and Nicole Bench, the
18 Settlement Agreement, the Court's entire file herein, and on such other argument and evidence as
19 the Court may entertain at the hearing on this motion.
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21 Dated: December 9, 2024

CROSNER LEGAL, P.C.

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24 Jamie K. Serb
25 Nikki Trenner
26 Zachary M. Crosner
27 Attorneys for Plaintiff JIHYUN KWON
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