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Attorneys for Plaintiff
DALIA DELGADO

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

DALIA DELGADO, on behalf of herself, and
all aggrieved employees,

Plaintiff,

v.

AVALON VILLA HEALTH CARE, LLC; and
DOES 1 through 100, inclusive,

Defendants.

Case No: 23STCV15615

*Assigned For All Purposes to
Judge Virginia Keeny*

REPRESENTATIVE ACTION

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

Date: March 26, 2025

Time: 8:30 a.m.

Dept. 45

Trial Date: TBD

Complaint Filed: July 5, 2023

1 **PLEASE TAKE NOTICE THAT** on March 26, 2025 at 8:30 a.m., or as soon thereafter
2 as the matter may be heard, in Department 45 of the above-entitled Court, located at 111 North
3 Hill Street, Los Angeles, California 90012, Plaintiff Dalia Delgado (“Plaintiff”), will and hereby
4 does move unopposed for an Order awarding payment of attorneys’ fees in the amount of \$100,000
5 award and actual costs in the amount of \$14,162.99 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 \$4,000 to Simpluris, Inc.

8 This motion will be based on this Notice, the supporting memorandum of points and
9 authorities, the Settlement Agreement, the Declarations of Robert Spencer, the Declaration of Raul
10 Perez, the Declaration of Plaintiff Dalia Delgado, the documents and records on file in this matter,
11 and such additional arguments, authorities, and evidence and other matters as may be presented by
12 the Parties hereafter.

13
14 Dated: February 28, 2025

KELLER GROVER LLP

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16 By: _____

17 ERIC A. GROVER
18 ROBERT SPENCER
19 *Counsel for Plaintiff*
20 DALIA DELGADO
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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 **February 28, 2025**, in the case of *Dalia Delgado v. Avalon Villa Health Care, LLC*, Los Angeles Superior Court Case Number 23STCV15615, 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