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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF SAN BERNARDINO**
17

18 LOUIS NORIEGA and THERESA MOORE,
19 individuals, on behalf of themselves and on
behalf of all persons similarly situated,

20
21 Plaintiffs,

22 vs.

23 QVC, INC., a Corporation; and DOES 1
24 through 50, inclusive,

Case No.: CIVSB2319032

Assigned for all Purposes to:
Hon. Jessica Morgan
Dept. S-26

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

Date: May 28, 2025
Time: 8:30 a.m.
Dept.: S-26

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on May 28, 2025, at 8:30 a.m., in Department S-26 of the
3 above-captioned Court, located at 247 W. Third St., San Bernardino, California, plaintiffs Louis
4 Noriega and Theresa Moore, on behalf of themselves and the conditionally certified settlement class,
5 will and hereby do move the Court for an order granting final approval of the proposed class action
6 settlement, approving the payment of civil penalties, approving the class representative service
7 payments provided for the class action settlement, and approving payment of the Settlement
8 Administrator's fees and expenses. Plaintiffs also will and hereby do move the Court for an order
9 granting an award of attorney's fees in the amount of \$500,000 (1/3 of the gross settlement amount)
10 and costs in the amount of \$30,043.56, as provided in the proposed class action settlement.

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

16 This motion will be based on this Notice, the accompanying Memorandum of Points and
17 Authorities, the Settlement Agreement, the accompanying Declarations of Sepideh Ardestani, Kyle
18 Nordrehaug, and Markus Balthuis, the Court's entire file herein, and on such further evidence and
19 argument as may be presented at the hearing.

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21 Dated: May 6, 2025

CROSNER LEGAL, P.C.

**BLUMENTAL NORDREHAUG BHOWMIK DE BLOW
LLP**

22
23
24 By: 

Sepideh Ardestani

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Zachary Crosner

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Attorneys for Plaintiffs Louis Noriega and Theresa
Moore