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Attorneys for Plaintiff
APRIL THOMASON

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF EL DORADO**

APRIL THOMASON, on behalf of herself, and
all aggrieved employees,

Plaintiff,

v.

SEQUOIA SENIOR LIVING LLC, and DOES
1 through 50, inclusive,

Defendants.

Case No: 24CV0979

REPRESENTATIVE ACTION

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

Date: TBD
Time: TBD
Dept. 09

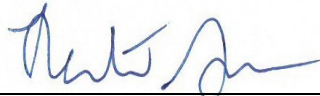
Complaint Filed: May 10, 2024
Trial Date: TBD

1 **PLEASE TAKE NOTICE THAT** on a date and time to be determined by the Court, or
2 as soon thereafter as the matter may be heard, in Department 9 of the above-entitled Court,
3 located at 3321 Cameron Park Drive, Cameron Park, California 95682, Plaintiff April Thomason
4 (“Plaintiff”), will and hereby does move unopposed for an Order awarding payment of attorneys’
5 fees in the amount of \$100,000 award and actual costs in the amount of \$19,615.26 to Plaintiff’s
6 Counsel, payment of a enhancement award in the amount of \$7,500 to the representative PAGA
7 Plaintiff, and payment for settlement administration fees of up to \$5,000 to Simpluris, Inc.

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

13
14 Dated: April 24, 2025

KELLER GROVER LLP

By: 

ERIC A. GROVER
ROBERT SPENCER
Counsel for Plaintiff
APRIL THOMASON

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 **April 24, 2025**, in the case of *April Thomason v. Sequoia Senior Living LLC*, El Dorado Superior Court Case Number 24CV0979, 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:

Jeremy Millstone, Esq.

Angelea Day

Stacey Beagle

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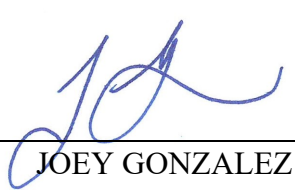
ADay@petersonwatts.com

sbeagle@petersonwatts.com

Attorneys for Defendant

SEQUIOA SENIOR LIVING LLC

☒	(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