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Attorneys for Plaintiff Karla Godinez,
individually, and on behalf of all other
similarly situated employees

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KARLA GODINEZ, as an individual
and on behalf of other similarly
situated employees,

Plaintiff,

v.

MERRITT HOSPITALITY, LLC, a
Delaware limited liability company,
and DOES 1-50, inclusive,

Defendants.

Case No.: 8:20-cv-00941-JWH-KES

*Assigned for all purposes to the
Honorable John W. Holcomb &
Magistrate Judge Karen E. Scott*

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

Date: January 19, 2024

Time: 9:00 a.m.

Place: Courtroom 9D

Action Filed: January 29, 2020
(Orange County Superior Court, Case
No. 30-2020-01127848-CU-OE-CXC)
Trial Date: None

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

2 **PLEASE TAKE NOTICE THAT** on January 19, 2024 at 9:00 a.m., or as
3 soon thereafter as the matter may be heard at the above titled court, located at 411
4 West 4th Street, Santa Ana, CA 92701, in Courtroom 9D, the Honorable John W.
5 Holcomb presiding, Plaintiff Karla Godinez will and hereby does move the Court,
6 move this Court to award \$437,500.00 in attorneys' fees; \$20,000.00 in litigation
7 costs and expenses; \$5,000.00 for Plaintiff's incentive award; and \$25,000 for the
8 claims administrator's costs.

9 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the
10 Memorandum of Points and Authorities in Support of the Motion for Attorneys'
11 Fees, Costs, and Expenses, and a Class Representative Incentive Award; (3) the
12 Declaration of Armond M. Jackson; (4) the records, pleadings, and papers filed in
13 this action; and (5) upon such other documentary and oral evidence or argument as
14 may be presented to the Court at or prior to the hearing of this Motion.

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16 Dated: December 22, 2023

JACKSON LAW, APC

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18 By: /s/ Armond M. Jackson

19 Armond M. Jackson

20 Attorney for Plaintiff Karla Godinez
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