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Attorneys for Plaintiff
SERENA CARNES

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

SERENA CARNES, as an “aggrieved
employee” and on behalf of “aggrieved
employees” under the California Labor Code
Private Attorneys General Act,

Plaintiff,

v.

THE SALVATION ARMY, THE
SALVATION ARMY ARC SAN DIEGO; and
DOES 1 through 10, inclusive,

Defendants.

Case No: 37-2021-00020557-CU-OE-CTL

REPRESENTATIVE ACTION

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

[Assigned for all purposes to Judge Timothy
Taylor, Dept. C72]

Date: October 20, 2023
Time: 1:30 p.m.
Dept.: C72

Complaint filed: May 7, 2021
Trial date: February 16, 2024

1 **PLEASE TAKE NOTICE THAT** on October 20, 2023 at 1:30 p.m., or as soon
2 thereafter as the matter may be heard, in Department C72 of the above-entitled Court, located at
3 Hall of Justice, 330 W. Broadway, 6th Floor, San Diego, California 92101, Plaintiff Serena
4 Carnes (“Plaintiff”), will and hereby does move unopposed for an Order awarding payment of
5 attorneys’ fees and litigation costs in the amount of \$55,000 to Plaintiff’s Counsel, payment of a
6 service payment in the amount of \$5,000 to Plaintiff Serena Carnes, and payment for settlement
7 administration fees in the amount of up to \$12,000 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 Serena Carnes, 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: August 14, 2023

KELLER GROVER LLP

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16 By: 

17 ERIC A. GROVER
18 ROBERT SPENCER
19 *Counsel for Plaintiff*
20 SERENA CARNES
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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 August 14, 2023, in the case of *Carnes v. The Salvation Army, et al.*, San Diego Superior Court Case Number 37-2021-00020557-CU-OE-CTL, 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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Attorneys for Defendant

THE SALVATION ARMY

☒	(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