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12 Attorneys for Plaintiff CARLOS MORENO

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 CARLOS MORENO, individually, and on
16 behalf of all others similarly situated,

17 Plaintiff,

18 v.

19 PRETIUM PACKAGING, L.L.C., a
20 Delaware limited liability company, and
21 DOES 1 through 10, inclusive,

22 Defendants.

Case No. 8:19-cv-02500-SB-DFM

[Hon. Stanley Blumenfeld, Jr.]

**PLAINTIFF’S NOTICE OF
MOTION FOR ATTORNEYS’
FEES AND COSTS**

Date: August 6, 2021
Time: 8:30 a.m.
Courtroom: 6C

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

2 **PLEASE TAKE NOTICE** that on August 6, 2021 at 8:30 a.m. or as soon
3 thereafter as the matter can be heard in Courtroom 6C of the United States
4 District Court for the Central District of California located at 350 West 1st Street,
5 Los Angeles, California 90012, Plaintiff Carlos Moreno will, and hereby does,
6 move for an Order awarding Class Counsel reasonable attorneys' fees of
7 \$533,333.33 plus reimbursement of actual out of pocket costs of \$14,053.28.
8 The attorneys' fees Plaintiff seeks—one third of the common fund—would result
9 in a multiplier of 2.88 of their lodestar of \$185,500 as of June 3, 2021. In turn,
10 the out-of-pocket costs are also documented and reasonably incurred in litigating
11 this case.

12 Both the fees and costs sought are reasonable and warranted under the facts
13 of the case and applicable law, as set forth in the accompanying Memorandum of
14 Points and Authorities, the Declaration of Justin F. Marquez, such oral argument
15 as may be heard by the Court, and all other papers on file in this action.

16 This motion is also made following the conference of counsel pursuant to
17 L.R. 7-3 which took place on February 4, 2021. Defendant indicated that it does
18 not oppose this motion.

19
20 Dated: June 3, 2021

Respectfully submitted,

21 **WILSHIRE LAW FIRM**

22
23 By: /s/ Justin F. Marquez

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26 Attorneys for Plaintiff