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*Co-Lead Counsel for the Class*

*[Additional Counsel Listed on Signature Page]*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

SHEILA BAKER, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

JOSEPH E. MCADAMS, LLOYD  
MCADAMS, JOE E. DAVIS, ROBERT C.  
DAVIS, MARK S. MARON, and  
DOMINIQUE MIELLE,

Defendants.

Lead Case No. 21STCV07569

Consolidated with:

Case No. 21STCV07571

Case No. 21STCV08413

Hon. Carolyn B. Kuhl, judge  
Dept 12 Spring Street

**NOTICE OF PLAINTIFFS' MOTION FOR  
FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT AND FOR AN AWARD  
OF ATTORNEYS' FEES AND EXPENSES**

Hearing Date: November 14, 2023

Time: [10:30 a.m.]

Location: Spring Street Courthouse, Dept. 12

Action Filed: February 24, 2021

TO THE PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT, on November 14, 2023, Plaintiffs Sheila Baker, Benjamin Gigli, and Merle Bundick ("Plaintiffs") will make a motion before the above-captioned Court, located at 312 North Spring Street, Los Angeles, CA 90012, for an Order:

1. Finally certifying the Settlement Class;
2. Finally approving Plaintiffs as Lead Plaintiffs for the Class;
3. Finally approving Plaintiffs' selection of Monteverde & Associates PC and Kahn Swick & Foti, LLC as Class Counsel;

4. Finally approving the settlement under the terms of the Amended Stipulation and Agreement of Settlement, Compromise, and Release, dated June 15, 2023;
5. Finally approving the payment of reasonable attorneys' fees to Class Counsel in the amount of one million dollars (\$1,000,000.00), which is one-third of the settlement amount negotiated by the parties;
6. Finally approving reimbursement of Class Counsel's costs in the amount of \$35,100.71;
7. Finally approving an incentive award of one thousand dollars (\$1,000.00) to each of Plaintiffs Sheila Baker, Benjamin Gigli, and Merle Bundick in consideration of their extensive efforts in prosecuting this case;
8. Finally approving the payment of \$49,157.00 for costs incurred by the Settlement Administrator; and
9. Entering a Final Judgment consistent with the terms of the Amended Stipulation and Agreement of Settlement, Compromise, and Release.

Good cause exists for the granting of this Motion in that the proposed settlement is fair, reasonable, and adequate.

This motion is based upon the accompanying Memorandum of Points and Authorities, the Declaration of David E. Bower, the exhibits thereto, and all proceedings held herein.

Dated: September 26, 2023

**OF COUNSEL**

**MONTEVERDE & ASSOCIATES PC**

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By: 

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*Co-Lead Counsel for the Class*

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I am employed in the County of Los Angeles, State of California, with my business address as 600 Corporate Pointe, Suite 1170, Culver City, California. I am over the age of 18 years, and I am not a party to this Action.

**GREENBERG TRAURIG LLP**  
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I sent a copy of this document via electronic mail to the email addresses above via Caseanywhere pursuant to the agreement of all parties for service of documents in this case.

September 26, 2023



David E Bower