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28 Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Audrey Heredia, as successor-in-interest  
to the Estate of Carlos Heredia; Amy  
Fearn as successor-in-interest to the  
Estate of Edith Zack; and Helen Ganz,  
by and through her Guardian ad Litem,  
Elise Ganz; on behalf of themselves and  
all others similarly situated,

Plaintiffs,

vs.

Sunrise Senior Living, LLC; Sunrise  
Senior Living Management, Inc.; and  
Does 2 - 100,

Defendants.

CASE NO. 8:18-cv-1974-JLS (JDEx)

**PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR  
ATTORNEYS' FEES, COSTS, AND  
SERVICE AWARDS**

Date: November 8, 2024  
Time: 10:30 a.m.  
Place: Courtroom 8A, 8<sup>th</sup> Floor  
Judge: Hon. Josephine Staton

1 Please take notice that Plaintiffs' Motion for Attorneys' Fees, Costs, and  
2 Service Awards will be heard on November 8, 2024, at 10:30 a.m., or as soon  
3 thereafter as this matter may be heard in Courtroom 8A, 8<sup>th</sup> Floor, before the  
4 Honorable Josephine L. Staton of the above-entitled court, located at 350 West 1<sup>st</sup>  
5 Street, Los Angeles, California, 90012.

6 Pursuant to Federal Rule of Civil Procedure 23(h), Plaintiffs will and hereby  
7 do move for an order awarding (a) attorneys' fees in the amount of \$10.5 million; (b)  
8 reimbursement of litigation costs and expenses in the amount of \$1.7 million; and (c)  
9 service awards of \$15,000 to each Named Plaintiff, totaling \$30,000.

10 The motion is based upon this notice of motion and motion, the memorandum  
11 of points and authorities, the accompanying Declarations, the pleadings on file in this  
12 action, and such other matters that may be brought to the Court's attention at or before  
13 the hearing. This motion is made following the conference of counsel pursuant to  
14 L.R. 7-3 which took place on September 26, 2024.

15  
16 Dated: September 26, 2024

/s/Christopher J. Healey

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