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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

10 ADAM HOFFMAN, individually and on
11 behalf of all others similarly situated, and
SAMUEL JASON, individually and on behalf
12 of all others similarly situated,

13 Plaintiffs,

14 v.

15 CITY OF LOS ANGELES,

16 Defendant.
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Case No. BC672326

**[PROPOSED] ORDER AWARDING
ATTORNEYS' FEES, REIMBURSEMENT
OF LITIGATION EXPENSES AND
CLASS REPRESENTATIVE SERVICE
AWARDS**

Assigned for All Purposes to:

Hon. Stuart M. Rice

Dept. SSC-1

Date: December 20, 2023

Time: 10:30 a.m.

Action Filed: August 15, 2017

19 This matter came on for hearing on December 20, 2023 (the "Settlement Hearing") on
20 Plaintiffs' Counsel's motion for an award of attorneys' fees, reimbursement of Litigation
21 Expenses and class representative service awards (the "Fee Motion"). The Court having
22 considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing
23 that notice of the Settlement Hearing substantially in the form approved by the Court was mailed
24 and/or emailed to all Class Members who or which could be identified with reasonable effort
25 pursuant to the specifications of the Court; and the Court having considered and determined the
26 fairness and reasonableness of the award of attorneys' fees, litigation expenses and class
27 representative service awards requested,

28 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

[PROPOSED] ORDER AWARDING ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES
AND CLASS REPRESENTATIVE SERVICE AWARDS

1 1. This Order incorporates by reference the definitions in the First Amended
2 Stipulation and Agreement of Settlement dated May 30, 2023 (the “Stipulation”) and filed with the
3 Court that same day, and all capitalized terms not otherwise defined herein shall have the same
4 meanings as set forth in the Stipulation.

5 2. The Court has jurisdiction to enter this Order and over the subject matter of the
6 Action and all Parties to the Action, including all Class Members.

7 3. Notice of Plaintiffs’ Counsel’s Fee Motion was given to all Class Members who
8 could be identified with reasonable effort. The form and method of notifying the Class of the Fee
9 Motion satisfied the requirements of due process, and all other applicable law and rules,
10 constituted the best notice practicable under the circumstances, and constituted due and sufficient
11 notice to all persons and entities entitled thereto.

12 4. Plaintiffs’ Counsel are hereby awarded attorneys’ fees in the amount of _____%
13 of the Settlement Fund and \$ _____ in reimbursement of Plaintiffs’ Counsel’s litigation
14 expenses (which fees and expenses shall be paid from the Settlement Fund), which sums the Court
15 finds to be fair and reasonable.

16 5. In making this award of attorneys’ fees and reimbursement of expenses to be paid
17 from the Settlement Fund, the Court has considered and found that:

18 A. The Settlement: (i) has created a fund consisting of \$57,500,000 in cash that
19 has been funded into escrow pursuant to the terms of the Stipulation; and (ii) provides
20 substantial Non-Monetary Remedial Relief (*see* Stipulation, ¶10). As a result, numerous
21 Class Members will benefit from the Settlement that occurred because of the efforts of
22 Plaintiffs’ Counsel;

23 B. Copies of the Notice were mailed and/or emailed to at least 795,165
24 potential Class Members stating that Plaintiffs’ Counsel would apply for attorneys’ fees in
25 an amount not to exceed 33⅓% of the Settlement Fund and reimbursement of Litigation
26 Expenses in an amount not to exceed \$600,000. There were no objections to the requested
27 attorneys’ fees and expenses;

1 C. Plaintiffs' Counsel conducted the litigation and achieved the Settlement
2 with skill, perseverance and diligent advocacy;

3 D. The Action raised a number of complex issues;

4 E. Had Plaintiffs' Counsel not achieved the Settlement there would remain a
5 significant risk that Plaintiffs and the other members of the Class may have recovered less
6 or nothing from Defendants;

7 F. Plaintiffs' Counsel undertook the Action on a fully contingent basis, thereby
8 assuming the risk of loss;

9 G. The two law firms that represented Plaintiffs in this Action devoted over
10 11,574.70 hours, with a lodestar value of approximately \$6,993,376 to achieve the
11 Settlement; and

12 H. The amount of attorneys' fees awarded and expenses to be reimbursed from
13 the Settlement Fund are fair and reasonable and consistent with awards in similar cases.

14 6. Plaintiff Adam Hoffman is hereby granted a service award of \$ _____ from
15 the Settlement Fund for the time and effort he expended on behalf of the Class.

16 7. Plaintiff Samuel Jason is hereby granted a service award of \$ _____ from
17 the Settlement Fund for the time and effort he expended on behalf of the Class.

18 8. Any appeal or any challenge affecting this Court's approval regarding any
19 attorneys' fees and expense application shall in no way disturb or affect the finality of the
20 Judgment.

21 9. Exclusive jurisdiction is hereby retained over the Parties and the Class Members
22 for all matters relating to this Action, including the administration, interpretation, effectuation or
23 enforcement of the Stipulation and this Order.

24 10. In the event that the Settlement is terminated or the Effective Date of the Settlement
25 otherwise fails to occur, this Order shall be rendered null and void to the extent provided by the
26 Stipulation.

27 11. There is no just reason for delay in the entry of this Order, and immediate entry by
28 the Clerk of the Court is expressly directed.

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SO ORDERED this _____ day of _____, 2023.

The Honorable Stuart M. Rice
Judge of the Superior Court