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16 [Additional counsel appear on signature page]

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 BRIAN SMITH, JACQUELINE MOONEY,
20 ANGELA BAKANAS, and MATTHEW
21 COLÓN, individually and on behalf of all
22 others similarly situated,

23 Plaintiffs,

24 v.

25 VCA, INC., and THE PLAN COMMITTEE
26 FOR THE VCA, INC. SALARY SAVINGS
27 PLAN, and JOHN AND JANE DOES 1-50,

28 Defendants.

Case No. 2:21-cv-09140-GW-AGR
**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR AWARD OF
ATTORNEYS' FEES, COSTS, AND
SERVICE PAYMENTS**

Hearing: June 26, 2023
Time: 8:30 a.m.
Judge: Hon. George Wu
Ctrm: 9D

[Concurrently filed Declarations of
Erich P. Schork and Andrew W. Ferich]

NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE that on June 26, 2023 at 8:30 a.m., or as soon thereafter as the matter may be heard, in Courtroom 9D of the above-captioned Court before the Hon. George Wu, Plaintiffs Brian Smith, Jacqueline Mooney, Angela Bakanas, and Matthew Colon (collectively, “Plaintiffs”), by and through Class Counsel, will and hereby do move for an Order, consistent with the terms of the Class Action Settlement in this case, awarding Class Counsel attorneys’ fees of \$500,000, costs in the amount of \$50,000 and Service Payments of \$3,000 to each of the four Class Representatives.

This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Erich P. Schork, the Declaration of Andrew Ferich, the Class Action Settlement Agreement (the “Settlement”) previously filed with the Court (ECF 75-1), and all papers filed in support thereof, the argument of counsel at the hearing of this Motion, all papers and records on file in this matter, and such other matters as the Court may consider.

Dated: April 28, 2023

Respectfully submitted,

/s/ Erich P. Schork
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