

**Electronically Filed
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Case #18CV329690
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11 *Class Counsel*

12 [Additional counsel appear on signature page.]

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF SANTA CLARA

15 MATT WOLTHER, Individually and on)
16 Behalf of All Others Similarly Situated,)
17 Plaintiff,)

18 vs.)

19 SHUBHAM MAHESHWARI, et al.,)
20 Defendants.)

Lead Case No. 18CV329690
(Consolidated with No. 18CV332463 and
No. 18CV332644)

CLASS ACTION

PLAINTIFFS' COUNSEL'S NOTICE OF
MOTION AND MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND EXPENSES
AND AWARDS TO CLASS
REPRESENTATIVES PURSUANT TO 15
U.S.C. §77z-1(a)(4)

DATE: April 21, 2022
TIME: 1:30 p.m.
DEPT: 1
JUDGE: Hon. Sunil R. Kulkarni
DATE ACTION FILED: June 8, 2018

1 TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

2 PLEASE TAKE NOTICE that on April 21, 2022, at 1:30 p.m., or as soon thereafter as the
3 matter may be heard in Department 1, the Courtroom of the Honorable Sunil R. Kulkarni at the
4 Superior Court of California, County of Santa Clara, 191 North First Street, San Jose, California,
5 Plaintiffs' Counsel will, and hereby do, move for entry of an order: (i) awarding attorneys' fees; (ii)
6 paying litigation expenses incurred in prosecuting the Litigation; and (iii) awarding Class
7 Representatives compensation for their time and service representing the Class in this action. This
8 motion is based upon the Memorandum of Points and Authorities in Support of Plaintiffs' Counsel's
9 Motion for an Award of Attorneys' Fees and Expenses and Awards to Class Representatives Pursuant
10 to 15 U.S.C §77z-1(a)(4); the previously-filed Joint Declaration of James I. Jaconette and Francis A.
11 Bottini, Jr. in Support of Class Representatives' Unopposed Motion for Preliminary Approval of Class
12 Action Settlement; the previously-filed Declaration of Virginia Geraci; the previously-filed Declaration
13 of Veronica Dyer; the Declaration of Ellen Gusikoff Stewart; the Declaration of Ross D. Murray; the
14 Declaration of James I. Jaconette Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support
15 of Application for Award of Attorneys' Fees and Expenses; the Declaration of Francis A. Bottini, Jr.
16 Filed on Behalf of Bottini & Bottini, Inc. in Support of Application for Award of Attorneys' Fees and
17 Expenses; the Declaration of Guillaume Buell Filed on Behalf of Thornton Law Firm LLP in Support of
18 Application for Award of Attorneys' Fees and Expenses; the Declaration of David W. Hall Filed on
19 Behalf of Hedin Hall LLP in Support of Application for Award of Attorneys' Fees and Expenses; the
20 Amended Stipulation of Settlement dated November 30, 2021; all other pleadings and matters of record;
21 and such additional evidence or argument as may be presented in support of the motion.


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1 A proposed order will be submitted with Plaintiffs' Counsel's reply submission on or before
2 April 14, 2022.

3 DATED: February 7, 2022

Respectfully submitted,

4 ROBBINS GELLER RUDMAN
5 & DOWD LLP
6 ELLEN GUSIKOFF STEWART
7 JAMES I. JACONETTE



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7 I declare under penalty of perjury that the foregoing is true and correct. Executed on February
8 7, 2022, at San Diego, California.

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11 MARIANNE MALONEY
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