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6 *Attorneys for Plaintiffs and Class Counsel*

7
8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 MONICA RAEL and ALYSSA HEDRICK,
11 on behalf of themselves and all others
similarly situated,

12 Plaintiffs,

13 v.

14 THE CHILDREN’S PLACE, INC., a
15 Delaware corporation, and DOES 1-50,
inclusive,

16 Defendants.

Case No: 3:16-cv-00370-GPC-LL

CLASS ACTION

**PLAINTIFFS’ NOTICE OF
UNOPPOSED MOTION AND
UNOPPOSED MOTION FOR
ATTORNEYS’ FEES, COSTS, AND
INCENTIVE AWARD**

Date: July 31, 2020
Time: 1:30 p.m.
Judge: Hon. Gonzalo P. Curiel
Crtrm: 2D

17
18 **TO THE COURT, PARTIES, AND ATTORNEYS OF RECORD:**

19 **PLEASE TAKE NOTICE** that, on January 28, 2020, this Court granted
20 preliminary approval of the class action Settlement¹ in this matter and set the Fairness
21 Hearing to be held on July 31, 2020, at 1:30 p.m. in Department 2D of the above-entitled
22 Court. At the Fairness Hearing, or as soon thereafter as counsel can be heard, Plaintiffs
23 will, and hereby do, move for an Order Awarding Attorneys’ Fees, Costs, and Incentive
24 Award.

25 Class Counsel requests an award of \$1,080,000 in attorneys’ fees and costs to be
26 approved by this Court. Importantly, the requested fees and costs will be paid out

27
28 ¹ Capitalized terms herein, unless otherwise defined, have the same definitions as those terms in the Settlement Agreement and Release. ECF No. 60-2, Ex. 1.

1 separately and apart from any benefits paid to the Class. Named Plaintiffs, Monica Rael
2 and Alyssa Hendrick, also request an incentive award of \$2,500 each, as agreed to by
3 Defendant, in recognition of their risk in commencing this case and efforts in litigating this
4 Action.

5 Therefore, Plaintiffs, on behalf of themselves and the Class, submit this motion,
6 which is based upon this Notice of Motion and Motion, the Memorandum of Points and
7 Authorities and the Declaration of Todd D. Carpenter in support hereof and filed
8 concurrently herewith, the records and files in this Action, and such other and further
9 arguments as may be presented and considered.

10
11 Date: April 30, 2020

Respectfully submitted,

CARLSON LYNCH LLP

12 By: */s/ Todd D. Carpenter*

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