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18 UNITED STATES DISTRICT COURT
 19 CENTRAL DISTRICT OF CALIFORNIA

20
 21 ISIDORA LOPEZ-VENEGAS, *et al.*,

22 Plaintiffs,

23 v.

24 JEH JOHNSON, *et al.*,

25 Defendants.

No. CV 13-03972-JAK (PLAx)

**NOTICE OF MOTION AND
 MOTION FOR ATTORNEYS'
 FEES AND COSTS;
 MEMORANDUM OF POINTS
 AND AUTHORITIES;
 DECLARATIONS IN
 SUPPORT**

**Date: February 9, 2015
 Time: 8:30 a.m.
 Place: Courtroom 750
 Judge: Hon. John A. Kronstadt**

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD, PLEASE
2 TAKE NOTICE that pursuant to Fed. R. Civ. Pro 23(h), Representative Class
3 Plaintiffs Isidora Lopez-Venegas, Ana Maria Duenas, Gerardo Hernandez-
4 Contreras, Efrain Garcia-Martinez, Alejandro Serrato, and Arnulfo Sierra
5 (“Representative Plaintiffs”) hereby move this Court to award \$700,000 in payment
6 for attorneys' fees and costs, as reasonable compensation for work performed on
7 behalf of the Class by counsel ACLU Foundation of San Diego and Imperial
8 Counties, American Civil Liberties Union Foundation of Southern California, and
9 Cooley LLP (collectively, “Class Counsel”).

10 The hearing for this application will take place on February 9, 2015, at 8:30
11 a.m., or as soon thereafter as the matter may be heard, in Courtroom 750 of the
12 above-entitled court, located at 255 East Temple Street, Los Angeles, California,
13 90012.

14 Plaintiffs’ motion is based on this Notice and Motion, the attached
15 Memorandum, the Declarations of Bardis Vakili, Darcie Tilly, Ahilan
16 Arulanantham, Carol V. Sobel, Marc Van der Hout, Sean Riordan, David Loy,
17 Mitra Ebadolahi, Gabriela Rivera, and all pleadings and other documents on file
18 with this Court, as well as any other evidence or argument that may be presented
19 before or at the time of the hearing on the application.

20 Under Civil Local Rule 17-1.3, which refers to California Rule of Court
21 3.1384, a provision that itself incorporates by reference California Rule of Court
22 7.951, the following is disclosed:

- 23 • Class Counsel did not become involved with this action, directly or
24 indirectly, at the instance of any party against whom the claim is asserted or
25 of any party's insurance carrier.
- 26 • Class Counsel is representing the other co-plaintiffs in this motion.
- 27 • Class Counsel has performed services in this case at no cost to the plaintiffs
28 in this action. However, under the Settlement Agreement preliminarily

1 approved by the Court in this case, Class Counsel is entitled to seek to
2 recover \$700,000 in costs and attorney's fees, which is the precise subject of
3 this motion.
4

5 Dated: December 17, 2014

ACLU FOUNDATION OF SAN DIEGO
& IMPERIAL COUNTIES

7 /s/ Bardis Vakili

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