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2 Ex Kano S. Sams II (SBN 192936)
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10 Counsel for Lead Plaintiff Turton Inc.

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 IVAN BARON, Individually and on
14 Behalf of All Others Similarly Situated,

15 Plaintiff,

16 v.

17 HYRECAR INC., JOSEPH FURNARI
18 and ROBERT SCOTT BROGI,

19 Defendants.

Case No. 2:21-cv-06918-FWS-JC

**LEAD COUNSEL’S NOTICE OF
MOTION AND MOTION FOR AN
AWARD OF ATTORNEYS’ FEES
AND REIMBURSEMENT OF
LITIGATION EXPENSES**

Hearing Date: November 14, 2024

Hearing Time: 10:00 a.m.

Location: Courtroom 10D

Judge: Fred W. Slaughter

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1 **TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 PLEASE TAKE NOTICE that, pursuant to ECF No. 128, on November 14,
4 2024, at 10:00 a.m., or as soon thereafter as the Parties¹ may be heard by the
5 Honorable Fred W. Slaughter, in Courtroom 10D, located at the United States
6 Courthouse, 411 West 4th Street, Santa Ana, CA 92701, Court-appointed lead
7 counsel, Glancy Prongay & Murray LLP (“Lead Counsel”) will, and hereby does,
8 move the Court for entry of an Order awarding attorneys’ fees and reimbursement of
9 Litigation Expenses.

10 This motion is based upon the accompanying Memorandum of Law, the
11 Declaration of Ex Kano S. Sams II in Support of: (I) Lead Plaintiff’s Motion for
12 Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead
13 Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of
14 Litigation Expenses, all the documents and exhibits in support thereof, as well as all
15 the pleadings and papers on file in this matter and any further evidence and
16 argument as may be presented at the hearing.

17 Lead Counsel conferred with Defendants’ Counsel with respect to this
18 motion. Defendants’ counsel has authorized Lead Counsel to represent that
19 Defendants take no position with respect to this motion.

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26 ¹ All capitalized terms, unless otherwise defined herein, have the same meaning as
27 set forth in the Stipulation and Agreement of Settlement dated March 20, 2024 (the
28 “Stipulation”; ECF No. 121-1).

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DATED: October 10, 2024

GLANCY PRONGAY & MURRAY LLP

By: s/ Ex Kano S. Sams II

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Counsel for Lead Plaintiff Turton Inc.

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PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On October 10, 2024, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Central District of California, for receipt electronically by the parties listed on the Court’s Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 10, 2024.

s/ Ex Kano S. Sams II

Ex Kano S. Sams II