

1 Paul E. Heidenreich, SBN 116618
2 David W.T. Brown, SBN 147321
3 Brian C Carlin, SBN 206969
4 Huskinson, Brown, Heidenreich & Carlin
5 865 Manhattan Beach Blvd, Suite 200
6 Manhattan Beach, Cal. 90266
7 Telephone: 310/545-5459
8 Facsimile: 310/546-1019

6 Stephen Bernard, SBN 56553
7 Hector Marrache, SBN 255711
8 Bernard, Marrache LLP
9 10990 Wilshire Blvd, Suite 1175
10 Los Angeles, California 90024-4305
11 Telephone: (310) 312-0220
12 Facsimile: (310) 312-0016

13 Attorneys for the Certified class of Plaintiffs

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

15 JOE ORONOZ and LARRY PITTS, as
16 individuals and on behalf of all other
17 similarly situated "PERSONS" of
18 Unincorporated Los Angeles County,

19 Plaintiffs,

20 v.

21 THE COUNTY OF LOS ANGELES; and
22 DOES 1-1000, inclusive,

23 Defendants.

CASE NO.: BC334027
[consolidated with BC334145]
Assigned to the Honorable Emilie H. Elias

**NOTICE OF MOTION FOR FINAL
APPROVAL OF SETTLEMENT,
FINAL APPROVAL OF ATTORNEY
FEES AND COSTS, AND FINAL
APPROVAL OF CLASS
REPRESENTATIVE FEES**

[To be considered with the Motion papers
and Declarations filed for the November
20, 2008 Hearing]

Date: March 13, 2009
Time: 9:00
Dept: 308

25 TO THE PARTIES HEREIN AND TO THEIR ATTORNEYS OF RECORD

26 PLEASE TAKE NOTICE that on March 13, 2009 at 9:00 am in Department 308 of the
27 Los Angeles Superior Court located at 600 South Commonwealth Avenue, Los Angeles,
28 California 90005 counsel for the Certified Class of Plaintiffs will seek a Court Order providing

1 Final Approval of Class Settlement, Final Approval of Attorney Fees and Final Approval of Class
2 Representatives' Compensation.

3 These Final Orders will be sought based upon all of the papers, declarations, and Points
4 and Authorities previously presented for the Motion for Preliminary Approval of Settlement and
5 Motion for Preliminary Approval of Attorney Fees. Class counsel will seek final approval of the
6 payment of \$10,000 for each representative plaintiff and final approval of Attorney fees of
7 \$7,637,868.75 and attorney costs of \$4,053.36.

8 The Subject Motion shall be based upon all of the exhibits, declarations, Motions and
9 Points and Authorities that were filed, jointly and individually, by the parties for the November
10 20, 2008 Hearing that addressed the issues concerning (1) Preliminary approval of the Settlement,
11 (2) Preliminary approval of the attorney fees and costs, and (3) Preliminary Approval of the Fees
12 for the Representative Plaintiffs. Those moving papers are available to class members at the web
13 site: <http://www.utilitysettlement.com/index.htm>. The Notice provided to class members for the
14 subject hearing identified the hearing time and date and the amount of attorney fees that are being
15 sought. Further, the Notice identified the web site address where these documents can be located,
16 reviewed, copied and printed.

17 The Subject Motion for Final Approval of the Settlement, Attorney Fees and Class
18 Representative Fees will also be based upon Supplemental Points and Authorities, if any, and on
19 any additional Declarations filed by Class Counsel or by the County (as well as upon papers, if
20 any, filed in response to documents filed by any objectors) as authorized by the Court's Order.

21 Class Counsel respectfully request that the Court grant Final Approval of the Settlement,
22 the Attorney fees of \$7,637,868.75, attorney costs of \$4,053.36, and payments to the
23 representative plaintiffs of \$10,000 each.

24 Dated: February 6, 2009

Respectfully submitted,
Huskinson, Brown, Heidenreich, & Carlin, LLP

26 By: _____ / Signed / _____

27 Paul E. Heidenreich

28 Counsel for the Certified Class of Plaintiffs