

1 ZIMMERMAN REED, LLP
CHRISTOPHER P. RIDOUT (SBN: 143931)
2 E-mail: christopher.ridout@zimmreed.com
HANNAH B. FERNANDEZ (SBN: 294155)
3 E-mail: hannah.fernandez@zimmreed.com
2381 Rosecrans Ave., Suite 328
4 Manhattan Beach, California 90245
(877) 500-8780 - Telephone
5 (877) 500-8781 - Facsimile

6 MAHONEY LAW GROUP, APC
KEVIN MAHONEY (SBN: 235367)
7 E-mail: kmahoney@mahoney-law.net
ALINA B. MAZEIKA (303840)
8 E-mail: amazeika@mahoney-law.net
249 E. Ocean Boulevard, Suite 814
9 Long Beach, California 90802
10 (562) 590-5550 - Telephone
(562) 590-8400 - Facsimile

11 *Attorneys for Plaintiff*

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

14 SHONNTEY MOODIE, individually and on
15 behalf of all others similarly situated,

16 Plaintiff,

17 v.

18 MAXIM HEALTHCARE SERVICES,
19 INC., a Maryland Corporation, E-
20 VERIFILE.COM, INC., a Georgia
Corporation,

21 Defendants.

Case No.: CV 14-3471 FMO (ASx)

Assigned to Hon. Fernando M. Olguin

**PLAINTIFF'S NOTICE OF MOTION
AND UNOPPOSED MOTION FOR
AN AWARD OF CLASS
REPRESENTATIVE INCENTIVE
PAYMENT AND ATTORNEYS' FEES
AND COSTS**

Date: August 22, 2019
Time: 10:00 AM
Courtroom: 6D

Date Action Filed: May 5, 2014

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on August 22, 2019, or as soon thereafter as the
3 matter can be heard, in Courtroom 6D of the United States Courthouse located at 350
4 W. 1st Street, 6th Floor, Los Angeles, CA 90012, Class Representative Shonntey
5 Moodie (“Class Representative”), and Class Counsel Zimmerman Reed, LLP and
6 Mahoney Law Group, APC (together, “Class Counsel”) will and hereby do move for an
7 Order, consistent with the terms of the Class Action Settlement in this case, awarding:
8 (a) a Service Award of \$5,000 to the Named Plaintiff and Class Representative; and (b)
9 Class Counsel’s attorneys’ fees and costs in the amount of \$300,000.

10 This motion is based on this Notice of Motion and Motion, the accompanying
11 Memorandum of Points and Authorities, the Declarations of Christopher P. Ridout and
12 Kevin Mahoney, the Class Action Settlement Agreement (the “Settlement”) previously
13 filed with the Court (Dkt. 144-1), and all papers filed in support thereof, the Court’s
14 Order dated February 4, 2019 granting Plaintiff’s Unopposed Renewed Motion for
15 Class Certification and Preliminary Approval of Settlement Agreement (Dkt. 145), the
16 argument of counsel at the hearing of this Motion, all papers and records on file in the
17 matter, and such other matters as the Court may consider.

18 Respectfully submitted,

19 ZIMMERMAN REED, LLP

20
21 Dated: May 3, 2019

22 By: /s/ Christopher P. Ridout
23 Christopher P. Ridout
24 Hannah B. Fernandez

25 MAHONEY LAW GROUP, APC
26 Kevin Mahoney
27 Alina Mazeika

28 *Attorneys for Plaintiff*

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

SHONNTEY MOODIE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

MAXIM HEALTHCARE SERVICES,
INC., a Maryland Corporation, E-
VERIFILE.COM, INC., a Georgia
Corporation,

Defendants.

Case No.: CV 14-3471 FMO (ASx)

Assigned to Hon. Fernando M. Olguin

**[PROPOSED] ORDER GRANTING
PLAINTIFF’S UNOPPOSED MOTION
FOR AN AWARD OF CLASS
REPRESENTATIVE INCENTIVE
PAYMENT AND ATTORNEYS’ FEES
AND COSTS**

Date: August 22, 2019
Time: 10:00 AM
Courtroom: 6D

Date Action Filed: May 5, 2014

WHEREAS, this matter has come before the Court pursuant to the Motion for An Award of Class Representative Incentive Payment and Attorneys’ Fees and Costs, filed on May 3, 2019 (the “Motion”); and,

WHEREAS, this Court has considered all the submissions related to the Motion and is otherwise fully advised in the premises;

1 IT IS HEREBY ORDERED AS FOLLOWS:

2 1. The Court grants the Motion for An Award of Class Representative
3 Incentive Payment and Attorneys' Fees and Costs;

4 2. Based on the results obtained for the Class, the settlement fund created,
5 efforts made to preserve the fund, work performed, risks assumed and conduct
6 throughout the case Class Counsel Zimmerman Reed, LLP and Mahoney Law Group,
7 APC are awarded attorneys' fees and costs, and reimbursement of expenses equal to
8 \$300,000.00, payable pursuant to the schedule set forth in the Settlement Agreement
9 (Doc. 144-1);

10 3. Based on the results obtained for the Class, the settlement fund created,
11 efforts made to preserve the fund, work performed, risks assumed and conduct
12 throughout the case the Court approves a service award to the named Plaintiff and Class
13 Representative in the amount of \$5,000.00;

14 4. This Court shall maintain continuing jurisdiction over these settlement
15 proceedings to assure the effectuation thereof for the benefit of the Class.

16 **IT IS SO ORDERED.**

17
18 Dated: _____

The Honorable Fernando M. Olguin
United States District Judge