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Appointed Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE GOOGLE PLUS PROFILE
LITIGATION

) No. 5:18-CV-06164 (VKD)
)
) **PLAINTIFFS' NOTICE OF PLAINTIFFS'**
) **MOTION FOR ATTORNEYS' FEES,**
) **COSTS, AND EXPENSES AND SERVICE**
) **AWARDS**
)
) Date: November 19, 2020
) Time: 9:00 A.M.
) Courtroom: 4
) Judge: Hon. Edward J. Davila
)

1 PLEASE TAKE NOTICE THAT on November 19, 2020, at 9:00 A.M., or on a later date
2 selected by the Court, Plaintiffs will and hereby do respectfully move the Court, in the courtroom
3 of the Honorable Edward J. Davila, Courtroom 4, on the 5th Floor of the United States District
4 Court for the Northern District of California, located at 280 South 1st Street, San Jose, California
5 95113, for an order granting Plaintiffs' Motion for Attorneys' Fees, Costs, and Expenses and
6 Service Awards.

7 This Motion is based on the notice of the Motion, Plaintiffs' Motion for Attorneys' Fees,
8 Costs, and Expenses and Service Awards, the contemporaneously filed Memorandum of Points
9 and Authorities, the attached declarations and exhibits, the arguments of counsel, the Motion for
10 Preliminary Approval, and any other matters in the record or that properly come before the Court.

11 Plaintiffs respectfully request that the Court grant Plaintiffs' Motion for Attorneys' Fees,
12 Costs, and Expenses and Service Awards, and that the Court enter an Order that:

- 13 (1) Awards Class Counsel \$1,875,000.00 in reasonable attorneys' fees for Class Counsel's
14 efforts in litigating this action and obtaining the benefits for the Class afforded by the
15 Settlement;
- 16 (2) Awards Class Counsel \$64,603.23 in litigation costs and expenses reasonably
17 expended, plus a \$5,000.00 reserve for costs reasonably anticipated, for a total of
18 \$69,603.23 in litigation costs and expenses;
- 19 (3) Awards Service Awards of \$1,500.00 per Plaintiff as representatives of the Class, as
20 determined by their involvement as described in the Memorandum in Support of this
21 Motion; and
- 22 (4) Grants further relief as the Court deems just and proper.

23 Undersigned counsel further represents that this Notice, Plaintiffs' Motion for Attorneys'
24 Fees, Costs, and Expenses and Service Awards, the contemporaneously filed Memorandum of
25 Points and Authorities, and the attached declarations and exhibits will be provided to the Claims
26 Administrator and posted to the Settlement Website for review by the Class.

27 Dated: September 28, 2020

/s/ John A. Yanchunis

28 JOHN A. YANCHUNIS (*pro hac vice*)

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Appointed Class Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

Executed on September 28, 2020.

/s/ John A. Yanchunis

John A. Yanchunis