Beth E. Terrell, CSB 178181 ORIGINAL FILED Email: bterrell@tmdwlaw.com 2 Jennifer Rust Murray, Admitted Pro Hac Vice Email: jmurray@tmdwlaw.com AUG 082011 TERRELL MARSHALL DAUDT & WILLIE PLLC 936 North 34th Street, Suite 400 4 LOS ANGELES Seattle, Washington 98103-8869 SUPERIOR COURT 5 Telephone: (206) 816-6603 Facsimile: (206) 350-3528 6 [Additional Counsel Appears on Signature Page] 7 8 Attorneys for the Plaintiffs 9 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA 10 COUNTY OF LOS ANGELES 11 THERON COOPER and ALICE TRAN, individually and on behalf of all others 12 NO. BC448670 similarly situated, 13 NOTICE OF MOTION AND Plaintiffs, PLAINTIFFS' UNOPPOSED 14 MOTION FOR AN AWARD OF 15 ATTORNEYS' FEES AND EXPENSES AND INCENTIVE AMERICAN HONDA MOTOR CO., INC., a 16 PAYMENTS TO NAMED California corporation, **PLAINTIFFS** 17 Defendant. Complaint Filed: November 1, 2010 18 19 **CLASS ACTION** 20 Judge: Hon. William F. Highberger 21 Department: 307 22 Date: Friday, September 16, 2011 Time: 11:00 a.m. 23 24 25 26 NOTICE OF MOTION AND PLAINTIFFS' UNOPPOSED 27 MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND INCENTIVE PAYMENTS TO NAMED PLAINTIFFS - 1

## TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT, as it may be heard, before the Honorable William F. Highberger in Department 307 of the Central Civil West Courthouse, 600 South Commonwealth Avenue, Los Angeles, California, 90005, on Friday, September 16, 2011, at 11:00 a.m., Plaintiffs will and hereby do request that the Court enter an order granting Plaintiffs' unopposed motion for an award of attorneys' fees and expenses and incentive payments to named Plaintiffs in the above-titled action.

This request is made pursuant to Rule 983 of the California Rules of Court and is based upon this Notice, the Memorandum of Points and Authorities in support thereof, and the Declaration of Beth E. Terrell, attached hereto, and upon such other evidence and argument as may be presented at the hearing of this Motion.

DATED this 8th day of August, 2011.

TERRELL MARSHALL DAUDT & WILLIE PLLC

By:

Beth E. Terrell, CSB 178181

Both Level

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NOTICE OF MOTION AND PLAINTIFFS' UNOPPOSED MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND INCENTIVE PAYMENTS TO NAMED PLAINTIFFS - 2

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EXPENSES AND INCENTIVE PAYMENTS TO NAMED

PLAINTIFFS - 3

1	PROOF OF SERVICE
2	I am a citizen of the United States and am employed in King County, Washington. I am
3	over the age of eighteen (18) years and not a party to this action; my business address is 936
4	North 34th Street, Suite 400, Seattle, Washington, 98103-8869.
5	On August 8, 2011, I served the preceding document by placing a true copy thereof
6	enclosed in a sealed envelope and served in the manner and/or manners described below to
7	each of the parties herein and addressed as on the attached list.
9	☐ BY MAIL: I caused such envelope(s) to be deposited in the mail at my business address, addressed to the addressee(s) designated. I am readily familiar with Terrell Marshall Daudt & Willie PLLC's practice for collection and processing of correspondence and pleadings for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business.
10 11	
12 13	☐ BY HAND DELIVERY: I caused such envelope(s) to be delivered by hand to the addressee(s) designated.
14	☐ BY OVERNIGHT COURIER SERVICE: I caused such envelope(s) to be delivered via overnight courier service to the addressee(s) designated.
15 16	☐ BY FACSIMILE: I caused said document to be transmitted to the telephone number(s) of the addressee(s) designated.
17 18	BY ELECTRONIC MAIL: I caused said document to be transmitted to the email addresses of the addressee(s) designated.
19	I declare under penalty of perjury under the laws of the State of Washington that the
20	foregoing is true and correct.
21	Executed at Seattle, Washington, on the 8th day of August, 2011.
22	
23	On fail
24	Both Level
25	
26 27	NOTICE OF MOTION AND PLAINTIFFS' UNOPPOSED MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND INCENTIVE PAYMENTS TO NAMED PLAINTIFFS - 4

## PROOF OF SERVICE LIST

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27	NOTICE OF MOTION AND PLAINTIFFS' UNOPPOSED MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND INCENTIVE PAYMENTS TO NAMED PLAINTIFFS - 5