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ELECTRONICALLY FILED
Superior Court of California,
County of Tulare
08/21/2026
By: Charisma Hughes,
Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF TULARE**

RONALD PIERCE, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

SINGLEPOINT OUTSOURCING,

Defendant.

Case No. VCU314801

*[Assigned for All Purposes to:
Hon. David C. Mathias]*

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR AWARD OF ATTORNEYS'
FEES, COSTS, EXPENSES, AND SERVICE
AWARD**

Date: January 14, 2027

Time: 8:30 a.m.

Dept.: 1

Judge: Hon. David C. Mathias

Complaint Filed: November 5, 2024

Trial Date: Not Set

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on January 14, 2027, at 8:30 a.m., or as soon thereafter as the matter can be heard in Department 1 of this Court, located at 221 S Mooney Blvd # 201, Visalia, California, Plaintiff Ronald Pierce ("Plaintiff"), individually and on behalf of all others similarly situated ("Class Members"), will move the Court, pursuant to California Civil Procedure Code § 382 and California Rule of Court 3.769, for an order: (1) awarding Class Counsel's attorneys' fees in the amount of \$216,666.67; (2) awarding Class Counsel reimbursement of their

1 costs and expenses in the amount of \$2,056.79; and (3) awarding Representative Plaintiff a service
2 award in the amount of \$1,500, as provided for in the Settlement Agreement.

3 This motion is made pursuant to the parties' executed Settlement Agreement, the Court's
4 Order Granting Preliminary Approval of Class Action Settlement and Conditionally Certifying
5 Settlement Class, Rule 3.769(g) and (h) of the California Rules of Court, which requires a hearing
6 before this Court for final approval of the proposed class action settlement and entry of judgment,
7 California Code of Civil Procedure § 382, and the Court's inherent power to supervise class action
8 litigation, and on the grounds that the attorneys' fees are fair, reasonable, and adequate and not the
9 result of bad faith or collusion.

10 This motion is based on this Notice of Motion and Motion, the accompanying Memorandum
11 of Points and Authorities, the accompanying declaration of the appointed Class Counsel, the
12 declaration of the appointed Class Representative submitted in connection with the Unopposed
13 Motion for Preliminary Approval, Plaintiff's counsel and the exhibits thereto, the Parties' executed
14 Settlement Agreement, the Court's Order Granting Preliminary Approval of Class Action
15 Settlement and Conditionally Certifying Settlement Class, the oral arguments of counsel, as well as
16 all other records and papers on file in this action or that properly come before the Court.

17 WHEREFORE, premises considered, Plaintiff respectfully requests this Court grant this
18 Unopposed Motion for Award of Attorneys' Fees, Expenses, and Service Awards.

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21 Date: August 21, 2026

MILBERG PLLC

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23 By: /s/ John J. Nelson
24 John J. Nelson, Esq.
25 *Attorneys for Plaintiff and the Putative Class*
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