

MAY 14 2019

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

JOSHUA LOUGHRIE and RICHARD
ESPINOZA, on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

TARGET CORPORATION, a Minnesota
Corporation; and DOES 1 through 10, inclusive,

Defendants.

No. CIVDS1804580

**[PROPOSED] ORDER FOR CLASS
REPRESENTATIVE ENHANCEMENTS
AND CLASS COUNSELS' REQUEST
FOR ATTORNEYS' FEES AND COSTS**

Date: May 14, 2019

Time: 8:30 a.m.

Judge: Hon. David S. Cohn

Dept.: S-26, 247 W. 3rd St.,
San Bernardino

Action Filed: February 27, 2018

Trial Date: None

1 **ORDER**

2 The motion of Representative Plaintiffs Joshua Loughrie and Richard Espinoza
3 (“Plaintiffs”) and their counsel for an order granting class representative enhancements and
4 attorneys’ fees and costs came on for hearing in Department S-26 of this Court on May 14, 2019 at
5 8:30 a.m.

6 The Court, having read the papers filed with regard to Plaintiffs’ and their counsels’ motion
7 for class representative enhancements and attorneys’ fees and costs, and hearing argument
8 regarding that motion on May 14, 2019, hereby FINDS, ORDERS AND ADJUDGES:

9 1. The Court has jurisdiction over the subject matter of this litigation and over all
10 parties to this action, including the Class Members, as defined in the settlement agreement.

11 2. Final approval of the settlement agreement has been granted. The terms of the
12 settlement agreement and any amendments thereto are incorporated herein.

13 3. Class Counsel shall be awarded attorneys’ fees in the aggregate amount of
14 \$10,500,000.00 as follows:

- 15 • \$4,985,345.00 payable to Becerra Law Firm;
- 16 • \$4,985,345.00 payable to Gleason & Favarote, LLP; and
- 17 • \$529,310.00 payable to the Law Offices of Kevin T. Barnes and the Law
18 Offices of Raphael A. Katri.

19 4. Class Counsel shall be awarded their reasonable costs incurred in the litigation in
20 the amount of ~~\$65,000.00~~ ^{\$59,682.87} as follows:

- 21 • \$5,130.22 payable to Becerra Law Firm;
- 22 • ~~\$40,082.53~~ ^{\$43,765.20} payable to Gleason & Favarote, LLP; and
- 23 • \$10,787.45 payable to the Law Offices of Kevin T. Barnes.

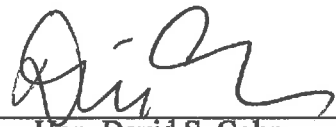
24 5. Named plaintiff Joshua Loughrie shall be granted an incentive award of \$15,000.00
25 for his service to the class and in consideration for his execution of a general release of all claims
26 against the Defendant and named plaintiff Richard Espinoza shall receive an incentive award of
27 \$15,000.00 for his service to the class and in consideration for his execution of a general release of
28 all claims against the Defendant.

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6. The Court orders the parties to the settlement agreement to perform forthwith each of their obligations as set forth according to its terms, and for the claims administrator to issue payment to Class Counsel of the award of attorneys' fees and costs, and to issue the class representative enhancement payments to Mr. Loughrie and Mr. Espinoza as noted above.

IT IS SO ORDERED.

Dated: 5/14/19



Hon. David S. Cohn
Judge of the Superior Court

PROOF OF SERVICE

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I, Thomas Steinhart, declare:

I am and was at the time of the service mentioned in this declaration, employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is Gleason & Favarote, LLP, 4014 Long Beach Blvd., Suite 300, Long Beach, CA 90807.

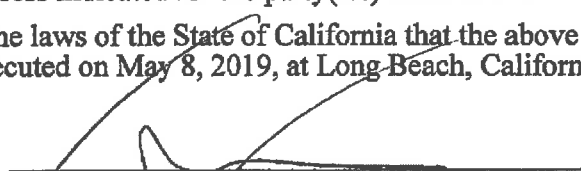
On May 8, 2019, I served a copy(ies) of the following document(s):

[PROPOSED] ORDER FOR CLASS REPRESENTATIVE ENHANCEMENTS AND CLASS COUNSELS' REQUEST FOR ATTORNEYS' FEES AND COSTS
on the parties to this action by placing them in a sealed envelope(s) addressed as follows:

Attorney	Party(ies) Served	Method of Service
JEFFREY D. WOHL RYAN D. DERRY ANNA M. SKAGGS PAUL HASTINGS LLP 101 California Street, 48th Floor San Francisco, California 94111 Telephone: (415) 856-7000 Facsimile: (415) 856-7100 jeffwohl@paulhastings.com ryanderry@paulhastings.co annaskaggs@paulhastings.com	Attorneys for Defendant TARGET CORPORATION	By Email

- [BY MAIL] I placed the sealed envelope(s) for collection and mailing by following the ordinary business practice of Gleason & Favarote, LLP, Long Beach, California. I am readily familiar with Gleason & Favarote, LLP's practice for collecting and processing of correspondence for mailing with the United States Postal Service, said practice being that, in the ordinary course of business, correspondence with postage fully prepaid is deposited with the United States Postal Service the same day as it is placed for collection.
- [BY OVERNIGHT COURIER] I caused the sealed envelope(s) to be delivered by a commercial courier service for overnight delivery to the offices of the addressee(s).
- [BY HAND] I directed the sealed envelope(s) to the party(ies) so designated on the service list to be delivered by Ace Attorney Service, Inc. this date.
- [BY FACSIMILE TRANSMISSION] I caused said document to be sent by facsimile transmission to the fax number indicated for the party(ies) listed above.
- [BY ELECTRONIC TRANSMISSION] I caused said document to be sent by electronic transmission to the e-mail address indicated for the party(ies) listed above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that this declaration was executed on May 8, 2019, at Long Beach, California.



Thomas Steinhart