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Electronically  
**FILED**  
by Superior Court of California, County of San Mateo  
ON 2/21/2023  
By /s/ Vanessa Jimenez  
Deputy Clerk

6 Attorneys for Plaintiffs and Petitioners

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF SAN MATEO**

11 BRAD BARUH, KATHY BARUH,  
12 CHARLES BOLTON, ELDRIDGE GRAY,  
13 JOHN LOCKTON, DAVID MARQUARDT,  
14 PAUL ROCHESTER, ARTHUR  
15 STROMBERG, CHARLES SYERS,  
individually and on behalf of all others  
similarly situated,

16 Plaintiffs and Petitioners,

17 v.

18 TOWN OF HILLSBOROUGH and DOES 1-  
19 100, inclusive,

20 Defendants and Respondents.

Case No. 16CIV02284

**PLAINTIFFS' NOTICE OF MOTION  
AND MOTION FOR ATTORNEYS'  
FEES, REIMBURSEMENT OF  
EXPENSES, AND SERVICE AWARD**

**Date:** ~~March 20, 2023~~ 8/14/2023

**Time:** 3:00 p.m.

**Dept.:** Hon. V. Raymond Swope

**Dept. 23**

21 **TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

22 NOTICE IS HEREBY GIVEN that on March 20, 2023, at 3:00 p.m., in Department 23 of  
23 the Superior Court of California, County of San Mateo, located at 400 County Center, Redwood  
24 City, CA 94063, Plaintiffs will bring a motion and hereby do move the Court, in conjunction with  
25 their motion for final approval of class action settlement pursuant to California Rule of Court  
26 3.769, for an award of attorneys' fees, reimbursement of expenses to Class Counsel, and for a  
27 service award to Plaintiffs.  
28

1 Specifically, Plaintiffs request that the Court enter an order (a) awarding Class Counsel  
2 attorneys' fees in the amount of \$400,000.00; (b) reimbursement of Class Counsel's expenses in  
3 the amount of \$10,982.09; and (c) service awards for Plaintiffs as follows: \$8,000.00 to John  
4 Lockton, \$8,000.00 to David Marquardt, \$5,000.00 to Charles Syers, \$5,000.00 to Charles Bolton,  
5 and \$5,000.00 to Paul Rochester. The foregoing shall be paid from the Settlement Fund in  
6 accordance with the Settlement Agreement.

7 This motion is made on the grounds that the requested fees, expenses, and awards are  
8 reasonable and in accordance with California law.

9 This motion is based on this notice of motion, the points and authorities filed herewith; the  
10 Declaration of Beau R. Burbidge, filed herewith; the Declaration of John Lockton, filed herewith;  
11 the declaration of David Marquardt, filed herewith; the declaration of Charles Syers, filed  
12 herewith; the declaration of Charles Bolton, filed herewith; the declaration of Paul Rochester, filed  
13 herewith; the concurrently filed motion for final approval of class action settlement, and all  
14 supporting papers and evidence; all of the records and files in this case; and any arguments that the  
15 Court may hear at the hearing.

16 DATED: February 21, 2023

WALKER, HAMILTON & KEARNS, LLP

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18 By: Beau R. Burbidge  
19 Beau R. Burbidge  
20 Attorneys for Plaintiffs  
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**PROOF OF SERVICE**

***Baruh, et al. v Town of Hillsborough***  
San Mateo County Superior Court Case No. 16CIV02284

My business address is 50 Francisco Street, Suite 460, San Francisco, California 94133. I am employed in the County of San Francisco, where this mailing occurs. I am over the age of 18 years and not a party to the within cause. On the date set forth below, I served the foregoing document(s) described as:

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND SERVICE AWARD**

on the following person(s) in this action by placing a true copy thereof enclosed in a sealed envelope addressed as listed below.

**[X] [X] BY ELECTRONIC SERVICE – E-MAIL** On **February 21, 2023**, based on an agreement or stipulation of the parties to accept electronic service and/or CCP §1010.6(e), I caused said document(s) to be sent via electronic mail to the email addresses listed below from my email address: [serena@whk-law.com](mailto:serena@whk-law.com).

Harriet A. Steiner, Esq. James Gilpin, Esq. Christopher Diaz, Esq. BEST BEST & KRIEGER LLP 500 Capitol Mall, Suite 1700 Sacramento, CA 95814 Tel: (916) 325-4000 Fax: (916) 325-4010 <b><i>Attorneys for Defendant Town of Hillsborough</i></b>	<a href="mailto:harriet.steiner@bbklaw.com">harriet.steiner@bbklaw.com</a> <a href="mailto:James.Gilpin@bbklaw.com">James.Gilpin@bbklaw.com</a> <a href="mailto:Christopher.Diaz@bbklaw.com">Christopher.Diaz@bbklaw.com</a> <a href="mailto:Jannine.South@bbklaw.com">Jannine.South@bbklaw.com</a>
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on **February 21, 2023** at San Francisco, California.

By: *Serena L. Broussard*  
Serena L. Broussard