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8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF VENTURA**

10
11 TIMUR SAFRANSKY, on behalf of himself)
and all others similarly situated,)

12 Plaintiffs)

13 vs.)

14)
15 FOSSIL GROUP, INC., FOSSIL STORES I,)
INC. and DOES 1 through 100, inclusive,)

16 Defendants)
17)
18)
19)

Case No. 56-2019-00526181-CU-BT-VTA

**NOTICE OF MOTION AND
PLAINTIFF'S UNOPPOSED MOTION
FOR ATTORNEYS' FEES, EXPENSES
AND INCENTIVE AWARD**

Date: August 20, 2019
Time: 8:30 a.m.
Judge: Hon. Jeffrey G. Bennett
Dept: 21
Reservation Number: 2435998

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL:**

2 On May 3, 2019, this Court granted preliminary approval of the class action settlement in
3 this matter and set a Final Fairness Hearing on August 20, 2019 at 8:20 a.m., in Department 21
4 located at 800 South Victoria Avenue, Ventura, CA 93009, and ordered that any papers in
5 support of a request for attorneys' fees, expenses, and incentive award be filed with the Court by
6 July 18, 2019. Thus, pursuant to this Court's Order, Plaintiff and Class, submit this Unopposed
7 Motion for Attorneys' Fees, Expenses and Incentive Award ("Motion").

8 Class Counsel and the Class Representative respectfully request that the Court grant the
9 Motion and award the requested attorneys' fees, expenses, and incentive award on the grounds
10 that these payments are fair and reasonable in light of the efforts and risk borne by Class Counsel
11 and the Class Representative.

12 This Motion is based upon this Notice of Motion and Motion, the accompanying
13 Memorandum of Points and Authorities in Support of Plaintiff's Unopposed Motion for
14 Attorneys' Fees, Expenses, and Incentive Award, the supporting Declaration of Zev B. Zysman,
15 the supporting Declaration of Timur Safransky, the records and files in this action, and upon
16 such further and additional papers and argument as may be presented herein.

17 Dated: July 17, 2019

LAW OFFICES OF ZEV B. ZYSMAN, APC

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21 By: 

Zev B. Zysman

*Attorneys for Plaintiff and the
Proposed Settlement Class*