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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF RIVERSIDE**

IN RE: RENOVATE AMERICA FINANCE ) Case No. RICJCCP4940  
CASES )  
)  
) **PLAINTIFFS' AMENDED NOTICE**  
) **OF MOTION AND MOTION FOR**  
) **AWARD OF ATTORNEYS' FEES,**  
) **REIMBURSEMENT OF EXPENSES,**  
) **AND CLASS REPRESENTATIVE**  
) **AWARDS**  
  
THIS DOCUMENT RELATES TO: )  
)  
) **ALL ACTIONS**  
)  
)  
) DATE: February 3, 2022  
) TIME: 9:00 a.m.  
) JUDGE: Hon. Sunshine S. Sykes  
) DEPT.: 6  
)  
)  
\_\_\_\_\_ )

1                   **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2                   **PLEASE TAKE NOTICE** that on February 3, 2022, at 9:00 a.m., or as soon thereafter as  
3 the matter may be heard, in Department 6 of the Superior Court of California, County of Riverside,  
4 located at 4050 Main Street, Riverside, California 92501, Class Counsel and Class Representatives  
5 George and Judith Loya (the “Loyas”), Richard Ramos, Michael Richardson, and Shirley Petetan  
6 (hereinafter, “Plaintiffs” or “Class Representatives”), will move for an order:

7                   1.       Awarding Class Counsel \$561,000.00 in attorneys’ fees and reimbursement of  
8 expenses of \$82,914.59 plus 33% of any monies to the Class obtained through the Bankruptcy  
9 Action (*In re: Renovate America, Inc., et al.*, Case No. 20-13172 (LSS) (Bankr. D. Del.)) through  
10 the Class Proof of Claim and any additional appropriate and reasonable expenses incurred; and

11                   2.       Approving the payment of Class Representative Awards to Plaintiffs in the total  
12 amount of \$20,000 (\$5,000 to each of three Class Representatives and jointly to the Loyas).

13                   This motion is based upon:

14                   a.       the Memorandum of Points and Authorities filed in support of the Motion for  
15 Award of Attorneys’ Fees, Reimbursement of Expenses, and Class Representative Awards, filed  
16 May 26, 2020;

17                   b.       the Joint Declaration of Janine L. Pollack and Rachele R. Byrd in Support of:  
18 (1) Plaintiffs’ Motion for Final Approval of Class Action Settlement; and (2) Plaintiffs’ Motion  
19 for Attorneys’ Fees, Reimbursement of Expenses and Payment of Class Representative Awards,  
20 filed May 26, 2020 (the “Joint Declaration I” or “Joint Decl. I”);

21                   c.       the May 26, 2020 Declaration of Cameron R. Azari, Esq. on Implementation and  
22 Adequacy of Settlement Notices and Notice Plan;

23                   d.       the November 14, 2019 Declaration of Randall S. Newman (submitted with  
24 Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement), attached to the Joint  
25 Declaration I as Exhibit D;

26                   e.       the Declaration of Rachele R. Byrd in Support of Plaintiffs’ Motion for Award of  
27 Attorneys’ Fees, Reimbursement of Expenses and Payment of Class Representative Awards, filed  
28

1 May 26, 2020;

2 f. the Declaration of Janine L. Pollack in Support of Plaintiffs' Motion for Award of  
3 Attorneys' Fees, Reimbursement of Expenses and Payment of Class Representative Awards, filed  
4 May 26, 2020;

5 g. the Declaration of Lee S. Shalov in Support of Plaintiffs' Motion for Award of  
6 Attorneys' Fees, Reimbursement of Expenses and Payment of Class Representative Awards, filed  
7 May 26, 2020;

8 h. the Declaration of C. Mario Jaramillo in Support of Plaintiffs' Motion for Award  
9 of Attorneys' Fees, Reimbursement of Expenses and Class Representative Awards, filed May 26,  
10 2020;

11 i. the Declaration of Jason P. Sultzer in Support of Plaintiffs' Motion for Award of  
12 Attorneys' Fees, Reimbursement of Expenses and Class Representative Awards, filed May 26,  
13 2020;

14 j. Plaintiffs' Supplemental Brief in Further Support of Motion for Final Approval of  
15 Class Action Settlement and Motion for Award of Attorneys' Fees, Reimbursement of Expenses,  
16 and Class Representative Awards, filed June 15, 2020;

17 k. the Supplemental Declaration of Cameron R. Azari, Esq. on Implementation and  
18 Adequacy of Settlement Notices and Notice Plan, filed June 15, 2020;

19 l. Plaintiffs' Second Supplemental Brief in Further Support of Motion for Final  
20 Approval of Class Action Settlement and Motion for Award of Attorneys' Fees, Reimbursement  
21 of Expenses, and Class Representative Awards, filed July 1, 2020;

22 m. the Second Supplemental Declaration of Cameron R. Azari, Esq. on  
23 Implementation and Adequacy of Settlement Notices and Notice Plan, filed July 1, 2020;

24 n. Plaintiffs' Third Supplemental Brief in Further Support of Motion for Final  
25 Approval of Class Action Settlement and Motion for Award of Attorneys' Fees, Reimbursement  
26 of Expenses, and Class Representative Awards, filed July 13, 2020;

27 o. the Third Supplemental Declaration of Cameron R. Azari, Esq. on Implementation  
28 and Adequacy of Settlement Notices and Notice Plan, filed July 13, 2020;

1 p. Plaintiffs' Fourth Supplemental Brief in Further Support of Motion for Final  
2 Approval of Class Action Settlement and Motion for Award of Attorneys' Fees, Reimbursement  
3 of Expenses, and Class Representative Awards, filed July 29, 202;

4 q. the Fourth Supplemental Declaration of Cameron R. Azari, Esq. on Implementation  
5 and Adequacy of Settlement Notices and Notice Plan, filed July 29, 2020;

6 r. Plaintiffs' Fifth Supplemental Brief in Further Support of Motion for Final  
7 Approval of Class Action Settlement and Motion for Award of Attorneys' Fees, Reimbursement  
8 of Expenses, and Class Representative Awards, filed concurrently herewith;

9 s. the Joint Declaration of Janine L. Pollack and Rachele R. Byrd in Support of:  
10 Plaintiffs' Fifth Supplemental Brief in Further Support of Motion for Final Approval of Class  
11 Action Settlement and Motion for Award of Attorneys' Fees, Reimbursement of Expenses and  
12 Class Representative Awards, filed concurrently herewith (the "Joint Declaration II" or "Joint  
13 Decl. II");

14 t. the Second Amended Settlement Agreement filed concurrently herewith as Exhibit  
15 A to the Joint Declaration II;

16 u. the Declaration of Cameron R. Azari, Esq. on Implementation and Adequacy of  
17 Supplemental Settlement Notice Plan;

18 v. all files and records in this action; and

19 w. any argument and evidence which may be presented at the hearing on this motion.  
20

21 DATED: January 20, 2022

By:   
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