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Steamfitters Local 449 Pension Plan
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15 *Liaison Counsel for Lead Plaintiff*

16 **UNITED STATES DISTRICT COURT**
 17 **CENTRAL DISTRICT OF CALIFORNIA**
 18 **WESTERN DIVISION**

19 STEAMFITTERS LOCAL 449 PENSION
 20 PLAN, Individually and on Behalf of All
 Others Similarly Situated,

21 Plaintiff,

22 vs.

23 MOLINA HEALTHCARE, INC., J.
 24 MARIO MOLINA, JOHN C. MOLINA,
 TERRY P. BAYER, and RICK HOPFER,

25 Defendants.

Case No. 2:18-cv-03579 AB (JCx)

CLASS ACTION

**NOTICE OF MOTION AND
 LEAD COUNSEL'S MOTION
 FOR AN AWARD OF
 ATTORNEYS' FEES AND
 PAYMENT OF EXPENSES**

Date: October 22, 2020

Time: 10:00 a.m.

Court: 7B (Hon. André Birotte Jr.)

1 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

2 PLEASE TAKE NOTICE that on October 22, 2020, at 10:00 a.m., or such
3 other date and time as set by the Court, Lead Counsel Labaton Sucharow LLP, on
4 behalf of Plaintiffs' Counsel, will move this Court for an Order, pursuant to Rules
5 23(h) and 54 of the Federal Rules of Civil Procedure, approving Lead Counsel's
6 application for an award of attorneys' fees and payment of expenses.

7 This Motion is supported by the accompanying Memorandum of Points and
8 Authorities in Support of Lead Counsel's Motion for an Award of Attorneys' Fees
9 and Payment of Expenses and the accompanying Declaration of Christine M. Fox
10 in Support of (I) Lead Plaintiff's Motion for Final Approval of Class Action
11 Settlement and Plan of Allocation and (II) Lead Counsel's Motion for an Award
12 of Attorneys' Fees and Payment of Expenses, dated September 17, 2020, and the
13 exhibits attached thereto (filed concurrently herewith); the pleadings and other
14 documents on file in this action; and all other written material or oral argument as
15 may be presented to the Court.

16 Although a proposed order is being submitted herewith pursuant to Local
17 Civil Rule 7-20, an updated order may be submitted with Lead Counsel's reply
18 submission on or before October 15, 2020, after the deadline for objecting has
19 passed.

20 **CIVIL LOCAL RULE 7-3**

21 This motion is being filed pursuant to paragraph 24 of the Court's Order
22 Granting Preliminary Approval of Class Action Settlement, Approving Form and
23 Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement
24 (ECF No. 86). Defendants have no interest in the relief being requested in this
25 motion.

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Dated: September 17, 2020

Respectfully submitted,

LABATON SUCHAROW LLP

By: /s/ Christine M. Fox
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Christine M. Fox (*pro hac vice*)
David J. Goldsmith (*pro hac vice*)
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Liaison Counsel for Lead Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2020, I authorized the electronic filing of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing by e-mail to all counsel registered to receive such notice.

/s/ Christine M. Fox
Christine M. Fox