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11 *Class Counsel for the Settlement Class*  
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13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
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17 *In re Trader Joe’s Tuna Litigation*

Case No. 2:16-cv-01371-ODW-AJW

18 **PLAINTIFF’S NOTICE OF**  
19 **MOTION AND MOTION FOR AN**  
20 **AWARD OF ATTORNEYS’ FEES,**  
21 **REIMBURSEMENT OF COSTS**  
22 **AND EXPENSES, AND AN**  
23 **INCENTIVE AWARD FOR THE**  
24 **CLASS REPRESENTATIVE**

25 Date: September 14, 2020  
26 Time: 1:30 p.m.  
Courtroom: 5D, 5th Floor  
27 Judge: Hon. Otis D. Wright II  
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**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE THAT on September 14, 2020 at 1:30 p.m., or as soon thereafter as the matter may be heard by the above-captioned Court, located at 350 West 1st Street, Courtroom 5D, 5th Floor, Los Angeles, California 90012, in the courtroom of the Honorable Otis D. Wright, II, Plaintiff Atzimba Reyes will and hereby does move for an order awarding attorneys’ fees, reimbursement of costs and expenses, and payment of an incentive award to Plaintiff as the Class Representative.

This motion is made on the grounds that an award of attorneys’ fees, reimbursement of costs and expenses, and payment of an incentive award is proper, given that the parties have agreed that Class Counsel may make such applications in the Settlement Agreement, the work of Class Counsel has conferred substantial benefits to the Class, and that such awards are permitted under the laws of this Circuit.

This motion is based on the concurrently filed Memorandum of Points and Authorities, the accompanying Declaration of Neal Deckant, the pleadings and papers on file herein, and any other written and oral arguments that may be presented to the Court.

Dated: June 10, 2020

**BURSOR & FISHER, P.A.**

By: L. Timothy Fisher  
L. Timothy Fisher

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