

1 Abbas Kazerounian, Esq. (SBN: 249203)  
Mona Amini, Esq. (SBN: 296829)  
2 **KAZEROUNI LAW GROUP, APC**  
245 Fischer Avenue, Unit D1  
3 Costa Mesa, California 92626  
Telephone: (800) 400-6808/Fax: (800) 520-5523  
4

Timothy D. Cohelan, Esq. (SBN 60827)  
5 J. Jason Hill, Esq. (SBN 179630)  
**COHELAN KHOURY & SINGER**  
6 605 C Street, Suite 200  
San Diego, California 92101  
7 Telephone: (619) 595-3001/Fax: (619) 595-3000

8 Patrick N. Keegan, Esq. (SBN 167698)  
**KEEGAN & BAKER, LLP**  
9 2292 Faraday Avenue, Suite 100  
Carlsbad, California 92008  
10 Telephone: (760) 929-9303/Fax: (760) 929-9260

11 [Additional counsel listed on next page]

12 Attorneys for Plaintiffs D'ANGELO SANTANA, SASHA SAMI SHAMON, and  
ALEXANDRIA N. VANDEN HEUVEL, on behalf of themselves and all others similarly  
13 situated,

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **FOR THE COUNTY OF SAN DIEGO**

16 D'ANGELO SANTANA, SASHA SAMI )  
SHAMON, and ALEXANDRIA N. VANDEN )  
17 HEUVEL, on behalf of themselves and all others )  
similarly situated, )

18 Plaintiffs, )

19 vs. )

20 RADY CHILDREN'S HOSPITAL-SAN )  
21 DIEGO, a California Corporation; and DOES 1 )  
through 100, inclusive, )

22 Defendants. )

) CASE NO. 37-2014-00022411-CU-MT-CTL  
) ASSIGNED FOR ALL PURPOSES TO:  
) The Honorable Joel R. Wohlfeil  
) Department 73

) **CONSOLIDATED CLASS ACTION**  
) **NOTICE OF MOTION AND MOTION**  
) **FOR AWARD OF ATTORNEYS' FEES**  
) **AND COSTS AND INCENTIVE AWARDS**

) Date: January 25, 2019  
) Time: 9:00 a.m.  
) Dept.: C-73  
) Judge: Hon. Joel R. Wohlfeil

) Complaint filed: July 8, 2014  
) Trial date: Vacated

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**11/26/2018** at 08:30:00 PM  
Clerk of the Superior Court  
By Richard Day, Deputy Clerk

1 ESTATE OF ABIGAIL MARCELENO, by and )  
through her successor in interest CYNTHIA )  
2 MARCELENO, )

3 )  
4 Plaintiff, )

5 vs. )

6 RADY CHILDREN'S HOSPITAL - SAN )  
DIEGO, a California Corporation; RADY )  
7 CHILDREN'S HEALTH SERVICES - SAN )  
DIEGO, a California Corporation; RADY )  
8 CHILDREN'S HOSPITAL AND HEALTH )  
CENTER, a California Corporation; DOES 1 )  
through 100, inclusive, )

9 Defendants. )  
10 )

CASE NO. 37-2014-00022652-CU-MC-CTL

Complaint filed: July 9, 2014  
Trial date: None set

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1 E. Elliot Adler, Esq. (SBN 229030)  
2 **ADLER LAW GROUP, APLC**  
3 402 West Broadway, Suite 860  
4 San Diego, California 92101  
5 Telephone: (619) 531-8700/Fax: (619) 342-9600

6 Abbas Kazerounian, Esq. (SBN 249203)  
7 **KAZEROUNI LAW GROUP, APC**  
8 245 Fischer Avenue, Suite DI  
9 Costa Mesa, California 92626  
0 Telephone: (800) 400-6808/Fax: (800) 520-5523

1 Todd M. Friedman, Esq. (SBN 216752)  
2 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**  
3 21550 Oxnard Street, Suite 780  
4 Woodland Hills, California 91367  
5 Telephone: (877) 206-4741/Fax: (866) 633-0228

6 Joshua B. Swigart, Esq. (SBN 225557)  
7 **HYDE & SWIGART**  
8 2221 Camino Del Rio South, Suite 101  
9 San Diego, California 92101  
0 Telephone: (619) 233-7770/ Fax: (619) 297-1022

1 Brian C. Gonzalez, Esq. (SBN 140348)  
2 **LAW OFFICES OF BRIAN C. GONZALEZ**  
3 2445 Fifth Avenue, Suite 330  
4 San Diego, California 92101  
5 Telephone: (760) 436-9529/Fax: (760) 512-0884

6 Attorneys for Plaintiffs D'ANGELO SANTANA, SASHA SAMI SHAMON, and ALEXANDRIA  
7 N. VANDEN HEUVEL, on behalf of themselves and all others similarly situated,

8 Robert A. Waller, Jr. (SBN 169604)  
9 **LAW OFFICE OF ROBERT A. WALLER, JR.**  
0 P.O. Box 999  
1 Cardiff-by-the-Sea, California 92007  
2 Telephone: (760) 753-3118/ Fax: (760) 753-3206

3 Thomas F. Feerick (SBN 176412)  
4 **FEERICK & ASSOCIATES**  
5 3268 Governor Drive, #406  
6 San Diego, California 92122  
7 Telephone: (858) 587-2000/ Fax: (760) 632-4853

8 Attorneys for Plaintiff ESTATE OF ABIGAIL MARCELENO

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

2 **PLEASE TAKE NOTICE THAT on January 25, 2019 at 9:00 a.m. in Department C-73**  
3 of the Superior Court of California, County of San Diego, located at 330 West Broadway, San  
4 Diego, California, 92101, Plaintiffs D'ANGELO SANTANA, SASHA SAMI SHAMON, and  
5 ALEXANDRIA N. VANDEN HEUVEL (collectively as "Class Representative Plaintiffs") will and  
6 hereby do move the Court for an Order awarding attorneys' fees, litigation expenses, and settlement  
7 administration expenses to Class Counsel; and awarding incentive payments to each of the Class  
8 Representatives, all of which are to be paid by Defendant separate and apart from all other benefits  
9 provided to Settlement Class Members under the terms of the Settlement Agreement preliminarily  
10 approved by this Court on October 26, 2018.

11 This motion is based on this notice of motion, the attached memorandum of points and  
12 authorities, the supporting declarations of appointed Class Counsel, filed concurrently herewith, the  
13 Motion for Final Approval of Class Action Settlement filed concurrently herewith, the parties'  
14 executed and preliminarily approved Settlement Agreement, the Court's Order Granting  
15 Preliminary Approval of Class Action Settlement, all other records and files in this action, and any  
16 other further evidence or argument that the Court may request or receive at or before the hearing of  
17 this motion.

18 **KAZEROUNI LAW GROUP, APC**

19  
20 Dated: November 26, 2018

By: \_\_\_\_\_

Abbas Kazerounian, Esq.

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22 Attorneys for Class Representative Plaintiffs  
23 D'ANGELO SANTANA, SASHA SAMI  
24 SHAMON, and ALEXANDRIA N. VANDEN  
25 HEUVEL, and Counsel for the Certified Class  
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