

GRAHAMHOLLIS APC  
3555 FIFTH AVENUE  
SAN DIEGO, CALIFORNIA 92103

1 Graham S.P. Hollis (SBN 120577)  
2 ghollis@grahamhollis.com  
3 Vilmarie Cordero (SBN 268860)  
4 vcordero@grahamhollis.com  
5 GRAHAMHOLLIS APC  
6 3555 Fifth Avenue, Suite 200  
7 San Diego, California 92103  
8 Telephone: 619.692.0800  
9 Facsimile: 619.692.0822

10 Attorneys for Plaintiff and Aggrieved Employees

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 FRESNO- CENTRAL DIVISION

13 TANYA PARMELEE, individually and on  
14 behalf of all similarly situated and aggrieved  
15 employees of Defendant in the State of  
16 California,

17 Plaintiff,

18 v.

19 DRIVELINE RETAIL MERCHANDISING,  
20 INC., and DOES 1 through 50, inclusive,

21 Defendants.

Case No.: 14 CECG01131 KCK

**NOTICE OF MOTION AND PLAINTIFF'S  
UNOPPOSED MOTION FOR ATTORNEY'S  
FEES AND COSTS**

Date: August 4, 2016  
Time: 3:30 p.m.  
Dept.: 403  
Judge: Hon. Kristi Culver Kapetan

Complaint Filed: April 23, 2014

22 **TO ALL PARTIES, THEIR ATTORNEYS OF RECORD AND THIS HONORABLE  
23 COURT:**


24 **PLEASE TAKE NOTICE THAT** on August 4, 2016 at 3:30 p.m. in Department 403 of the  
25 above-entitled Court, located at 1130 O Street, Fresno, CA 93721, Plaintiff Tanya Parmelee ("Plaintiff")  
26 hereby moves this Court, pursuant to California Code of Civil Procedures section 382 and California  
27 Rules of Court, Rule 3.769, for an unopposed entry of the [Proposed] Final Order Granting Approval of  
28 Plaintiff's Motion for Attorneys' Fees and Costs. Through her Motion, Plaintiff and Class Counsel seek  
to have an Order entered which grants attorney's fees in the amount of \$333,300.00, and \$15,000 for  
reimbursement of reasonable litigation costs. This motion is unopposed and Defendant will not be filing  
an opposition brief.

1 This motion is supported by the following documents filed concurrently herewith: Memorandum  
2 of Points and Authorities in Support of Motion for Attorney's Fees and Costs, the Declaration of  
3 Graham S.P. Hollis, Esq. and all Exhibits attached thereto, and any oral or written evidence that may be  
4 permitted by the Court at the hearing of this Motion.

5  
6 Respectfully submitted,

7  
8 Dated: May 27, 2016

GRAHAMHOLLIS APC

9  
10 By:   
11 GRAHAM S.P. HOLLIS  
12 VILMARIE CORDERO  
13 Attorneys for Plaintiff and Aggrieved Employees

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