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10
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES – CENTRAL DISTRICT
13

14
15 KHAI TU, on behalf of himself and all others
similarly situated,
16
17 Plaintiffs,
18
19 v.
20 UNITED DENTAL CORPORATION; UNITED
DENTAL FULLERTON CORP; UNITED
21 DENTAL IRVINE CORP; UNITED DENTAL
NORTHRIDGE CORP.; UNITED DENTAL
WILSHIRE CORPORATION; and DOES 1
through 300, inclusive,
22
23 Defendants.

Case No. BC542678

[CLASS ACTION]

**PLAINTIFF’S NOTICE OF MOTION
AND MOTION FOR ATTORNEYS’
FEES AND COSTS**

Date: May 30, 2023

Time: 11:00 a.m.

Dept.: 10

Judge: Honorable William F. Highberger

Action Filed: April 14, 2014

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT that on May 30, 2023 at 11:00 a.m., or as soon thereafter as the matter may be heard in Department 10 of the above-captioned Court at 312 North Spring Street, Los Angeles, CA 90012, before the William F. Highberger, plaintiff KHAI TU (“Plaintiff”) will move the Court to award Class Counsel attorneys’ fees and costs in the total amount of \$2,200,000.

This motion is based on this notice of motion and motion, the concurrently filed Memorandum of Points and Authorities, the Declarations of Gerald S. Ohn and Young W. Ryu and the exhibits attached thereto, all the prior pleadings and papers in this action, and upon such additional evidence or argument as may be presented to or required by the Court.

Dated: May 5, 2023

Respectfully submitted,

LAW OFFICES OF GERALD S. OHN, APC
LAW OFFICES OF YOUNG W. RYU, APC

/s/ Gerald S. Ohn

GERALD S. OHN
Attorneys for Plaintiff and the Class