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11 **THE SUPERIOR COURT OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

13 ROGER HARRIS, DUANE BROWN, AND
14 BRIAN LINDSEY,

15 Plaintiffs,

16 v.

17 FARMERS INSURANCE EXCHANGE AND
18 MID CENTURY INSURANCE COMPANY,

19 Defendants.

Case No. BC579498

*[Assigned to the Hon. Maren Nelson in Dept. 17
of Spring Street Courthouse]*

**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: June 17, 2020

Time: 9:00 a.m.

Department: 17

Complaint filed: April 22, 2015

Trial date: None set

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Class Counsel

1 **TO THE COURT AND DEFENDANT FARMERS INSURANCE EXCHANGE**
2 **AND MID CENTURY INSURANCE COMPANY AND THEIR ATTORNEYS OF**
3 **RECORD:**

4 PLEASE TAKE NOTICE that on June 17, 2020 at 9:00 a.m. or as soon thereafter as
5 counsel may be heard by the above-entitled Court, located at 312 North Spring Street, Los
6 Angeles, CA 90012, Roger Harris, Duane Brown, and Brian Lindsey will and hereby do move
7 for an order:

- 8 1. Granting Final Approval of the class action settlement as set forth in the Settlement
9 Agreement attached as Exhibit 1 to the Declaration of Cyrus Mehri filed herewith;
- 10 2. Certifying the Settlement Class that was preliminarily approved in this Court's
11 Preliminary Approval Order of January 7, 2020;
- 12 3. Appointing Plaintiffs Roger Harris, Duane Brown, and Brian Lindsey as Class
13 Representatives who were previously appointed in this Court's Preliminary Approval
14 Order of January 7, 2020;
- 15 4. Appointing as Class Counsel Plaintiffs' counsel—Mehri & Skalet PLLC, Tycko &
16 Zavareei LLP, and Berger Montague, PC—who were previously appointed in this
17 Court's Preliminary Approval Order of January 7, 2020;
- 18 5. Denying all timely objections to the Settlement; and
- 19 6. Entering Judgment consistent with the terms of the Settlement Agreement.

20 A copy of the [Proposed] Order of Final Approval and the [Proposed] Judgment are
21 being filed concurrently with this motion.

22 This motion is based on this Notice of Motion and Motion; the Memorandum of Points
23 and Authorities filed herewith; the concurrently filed Declarations of Cyrus Mehri, Andrea
24 Gold, Jeffrey Osterwise, and Wilmer Harris; Declaration of Cameron Azari; Declarations of
25 Plaintiffs Roger Harris, Duane Brown, and Brian Lindsey; Plaintiffs' Memorandum of Points
26 and Authorities in Support of Motion for Attorneys' Fees, Costs, Service Awards, and Notice
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1 and Administration Expenses; the papers and pleadings on file with the Court; and upon such
2 other evidence, information, or material as may be presented to the Court.

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DATED: May 21, 2020

MEHRI & SKALET PLLC
TYCKO & ZAVAREEI LLP
BERGER MONTAGUE PC
SCHONBRUN SEPLOW
HARRIS & HOFFMAN LLP

By: 
Cyrus Mehri
Attorneys for Plaintiffs

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<p>1 2 3 Peter Kahana, Esq. pkahana@bm.net 4 Jeff Osterwise, Esq. josterwise@bm.net 5 BERGER & MONTAGUE, P.C. 1818 Market Street, Suite 3600 6 Philadelphia, PA 19103 7 Tel.: (215) 875-3000 8 Fax: (215) 875-4613 9 <i>Class Counsel</i></p>	<p>James C. Castle, Esq. jcastle@mail.hinshawlaw.com HINSHAW & CULBERTSON, LLP 633 West Fifth Street, 47th Floor Los Angeles, CA 90071 Tel.: (213) 614-7343 Fax: (213) 614-7399 <i>Attorneys for Defendants</i> Farmers Insurance Exchange and Mid Century Insurance Co.</p>
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<p>17 Jay Angoff, Esq. jay.angoff@findjustice.com 18 Cyrus Mehri, Esq. Cyrus@findjustice.com 19 MEHRI & SKALET PLLC 1250 Conneticut Ave. NW, Suite 300 20 Washington, DC 2003 21 Tel.: (202) 822-5100 22 Fax: (202) 822-4997 23 <i>Class Counsel</i></p>	<p>Laura Robbins, Esq. laura.robbs@doj.ca.gov Andrea Schoor, Esq. andrea.schoor@doj.ca.gov CALIFORNIA DEPARTMENT OF JUSTICE 300 South Spring Street, Suite 1702 Los Angeles, CA 90013 Tel.: (213) 897-2000 Fax: (213) 897-5775 <i>Attorneys for California Department of</i> <i>Insurance, Dave Jones, in his capacity as</i> <i>Insurance Commissioner of the State of</i> <i>California</i></p>