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11 *for Individual and Representative*
12 *Plaintiffs Kamneel Maharaj, et al.*

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 IN RE: HYUNDAI AND KIA FUEL
16 ECONOMY LITIGATION

Case No. 2:13-ml-02424-GW-FFM

17 **CERTAIN NON-SETTLING**
18 **PLAINTIFFS' NOTICE OF MOTION**
19 **AND MOTION FOR ATTORNEYS'**
20 **FEES AND EXPENSES**

Hearing Date: February 26, 2014

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CERTAIN NON-SETTLING PLAINTIFFS' NOTICE OF MOTION AND MOTION
FOR ATTORNEYS' FEES AND EXPENSES

1 PLEASE TAKE NOTICE that on February 26, 2014, at 8:30 a.m., before the
2 Honorable George H. Wu of the United States District Court for the Central District of
3 California, Western Division, Courtroom 10, 312 North Spring Street, Los Angeles,
4 California 90012, certain Non-Settling Plaintiffs (listed below) will and hereby do move
5 this Court for award of attorneys' fees and expenses.

6 Liaison Counsel submits this motion and supporting memorandum on behalf of
7 the following Non-Settling Plaintiffs' counsel requesting the payment of attorneys' fees
8 and expenses in this matter:

- 9 • Ahdoot & Wolfson, PC, counsel in *Sutta v. Hyundai Motor America*, Case No.
10 8:13-cv-417-GW-FFM
- 11 • Berman DeValerio and Bell Davis Pitt, counsel in *Dunst v. Hyundai Motor*
12 *America*, Case No. 2:13-cv-1352-GW-FFM; *Patterson v. Kia Motors America*,
13 Case No. 2:14-cv-327-GW-FFM
- 14 • Berger & Montague, P.C., counsel in *Kurash, et al. v. Hyundai Motor*
15 *America, et al.*, Case No. 8:12-cv-2164-GW-FFM
- 16 • Bonsignore, PLLC, counsel in *Iocovozzi v. Kia Motors America*, Case No.
17 8:13-cv-159-GW-FFM; *Brown v. Kia Motors America*, Case No. 8:13-cv-441-
18 GW-FFM; *Woodward v. Kia Motors America*, Case No. 8:13-cv-443-GW-
19 FFM; *Cestaro v. Hyundai Motor America*, Case No. 8:13-cv-442-GW-FFM;
20 *Terhost v. Kia Motors America*, Case No. 8:13-cv-476-GW-FFM; *Martyn v.*
21 *Hyundai Motor America*, Case No. 8:13-cv-475-GW-FFM
- 22 • Cafferty Clobes Meriwether & Sprengel, LLP, counsel in *Figueroa v. Hyundai*
23 *Motor America*, 8:13-cv-373-GW-FFM
- 24 • Crowley Norman LLP and Payne Mitchell Law Group, LLP, counsel in
25 *Washburn v. Kia Motors Corporation, et al.*, Case No. 2:13-cv-1136-GW-FFM
- 26 • Davis & Norris LLP, counsel in *Maturani v. Hyundai Motor America*, Case
27 No. 2:13-cv-813-GW-FFM
- 28 • Doyle Lowther LLP, counsel in *Wilton, et al. v. Kia Motors America*, Case No.
8:12-cv-1917-GW-FFM
- Edelman, Combs, Lattuner & Goodwin, LLC, counsel in *Rottner v. Hyundai*
Motor America, Case No. 2:13-cv-815-GW-FFM

- 1 • Finkelstein, Blankinship, Frei-Pearson & Garber LLP, counsel in
2 *Graewingholt v. Hyundai Motor America*, Case No. 8:12-cv-1963-GW-FFM
- 3 • Girard Gibbs LLP, Liaison Counsel and counsel in *Maharaj, et al. v. Hyundai*
4 *Motor America*, Case No. 8:13-cv-70-GW-FFM
- 5 • Glancy Binkow & Goldberg LLP, counsel in *Sutta v. Hyundai Motor America*,
6 Case No. 8:13-cv-417-GW-FFM
- 7 • Goldenberg Schneider, LPA and Minnillo & Jenkins, LPA, counsel in *Sanders,*
8 *et al. v. Hyundai Motor America*, Case No. 2:13-cv-817-GW-FFM
- 9 • Gustafson Gluek PLLC, counsel in *Weber, et al v. Hyundai Motor America*,
10 Case No. 8:13-cv-27-GW-FFM
- 11 • John P. Nash, Attorney, Inc., counsel in *Graewingholt v. Hyundai Motor*
12 *America*, Case No. 8:12-cv-1963-GW-FFM
- 13 • Hyde & Swigart, counsel in *Bayard v. Hyundai Motor America*, Case No.
14 8:13-cv-257-GW-FFM
- 15 • Kaplan Fox & Kilsheimer LLP, counsel in *Young v. Kia Motors America*, Case
16 No. 2:13-cv-167-GW-FFM
- 17 • Kazerouni Law Group, APC, counsel in *Bayard v. Hyundai Motor America*,
18 Case No. 8:13-cv-257-GW-FFM
- 19 • Law Offices of Todd M. Friedman, counsel in *Bayard v. Hyundai Motor*
20 *America*, Case No. 8:13-cv-257-GW-FFM
- 21 • Mauriello Law Firm, APC, counsel in *Carullo v. Kia Motors America*, Case
22 No. 8:12-cv-2174-GW-FFM
- 23 • Milstein Adelman, LLP, counsel in *Figueroa v. Hyundai Motor America*, Case
24 No. 8:13-cv-373-GW-FFM
- 25 • MLG Automotive Law, APLC, counsel in *Young v. Kia Motors America*, Case
26 No. 2:13-cv-167-GW-FFM
- 27 • Pomerantz, Grossman, Hufford, Dahlstrom and Gross LLP, counsel in *Gordon*
28 *v. Hyundai Motor America*, Case No. 2:13-cv-1125-GW-FFM
- Shepherd, Finkelman, Miller & Shah, LLP, counsel in *Gordon v. Hyundai*
Motor America, Case No. 2:13-cv-1125-GW-FFM
- Simmons Hanly Conroy and McCallum, Methvin & Terrell, P.C., counsel in
Gudgalis v. Hyundai Motor America, Case No. 2:13-cv-1128-GW-FFM;
Quiroz v. Kia Motors America, Inc., Case No. 8:12-cv-2091-GW-FFM;

1 *Woodruff v. Kia Motors America, Inc.*, Case No. 2:13-cv-1124-GW-FFM;
2 *Armstrong v. Kia Motors America*, Case No. 2:13-cv-1122-GW-FFM;
3 *Hoessler v. Kia Motors America*, Case No. 2:13-cv-1129-GW-FFM; *Leggett v.*
4 *Kia Motors Corporation*, Case No. 2:13-cv-1134-GW-FFM; and *Hammond v.*
5 *Hyundai Motor America*, Case No. 2:13-cv-1132-GW-FFM

- 6 • Tate Law Group, LLC; Savage & Turner, P.C.; and Law Office of Drew
7 McElroy, counsel in *Iocovozzi v. Kia Motors America*, Case No. 8:13-cv-159-
8 GW-FFM; *Setser v. Kia Motors America*, Case No. 8:13-cv-387-GW-FFM;
9 *Fellers v. Kia Motors America*, Case No. 8:13-cv-384-GW-FFM; *Bonsignore*
10 *v. Kia Motors America*, Case No. 8:13-cv-386-GW-FFM; *Brown v. Kia Motors*
11 *America*, Case No. 8:13-cv-441-GW-FFM; *Woodward v. Kia Motors America*,
12 Case No. 8:13-cv-443-GW-FFM; *Myers v. Hyundai Motor America*, Case No.
13 8:13-cv-444-GW-FFM; *Cestaro v. Hyundai Motor America*, Case No. 8:13-cv-
14 442-GW-FFM; *Terhost v. Kia Motors America*, Case No. 8:13-cv-476-GW-
15 FFM; *Martyn v. Hyundai Motor America*, Case No. 8:13-cv-475-GW-FFM;
16 *Elliott v. Hyundai Motor America*, Case No. 8:13-cv-385-GW-FFM
- 17 • Whatley Kallas, LLP, counsel in *Wilton v. Kia Motors America*, Case No.
18 8:12-cv-1917-GW-FFM

19 This Motion is based on the contemporaneously filed memorandum of points and
20 authorities in support thereof, the compendium of declarations submitted by Non-
21 Settling Plaintiffs' counsel, and any oral argument the Court may consider.

22 DATED: December 23, 2014

Respectfully submitted,

GIRARD GIBBS LLP

By: /s/ Eric H. Gibbs

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Maharaj, et al.*

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CERTIFICATE OF SERVICE

I, Eric H. Gibbs, hereby certify that on December 23, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will serve notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List. Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the document upon confirmation of e-filing.

/s/ Eric H. Gibbs
Eric H. Gibbs

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Certificate of Service

CERTAIN NON-SETTLING PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR ATTORNEYS' FEES AND EXPENSES