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15 *Co-Lead Class Counsel*

16 [Additional counsel appear on signature page]

17 **UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 NICKOLAS TSUI and WILLIAM LUGO,  
20 individually and on behalf of all others  
21 similarly situated,

22 Plaintiffs,

23 v.

24 UNIVERSAL SERVICES OF AMERICA,  
25 LP, ALLIED UNIVERSAL TOPCO LLC,  
26 ALLIED UNIVERSAL BENEFITS  
27 COMMITTEE, and JOHN AND JANE  
28 DOES 1-50,

Defendants.

Case No. 8:22-cv-01158-JWH-JDE  
**PLAINTIFFS' NOTICE OF MOTION  
AND MOTION FOR AWARD OF  
ATTORNEYS' FEES, COSTS, AND  
SERVICE PAYMENTS**

Hearing: September 23, 2026  
Time: 10:00 a.m.  
Judge: John W. Holcomb  
Ctrm: 9D

[Concurrently filed Declarations of  
Erich P. Schork and Andrew W. Ferich]

**NOTICE OF MOTION AND MOTION**

PLEASE TAKE NOTICE that on September 23, 2026, at 10:00 a.m., or as soon thereafter as the matter may be heard, in Courtroom 9D of the above-captioned Court before the Hon. John W. Holcomb, Plaintiffs Nickolas Tsui and William Lugo (collectively, “Plaintiffs”), by and through Class Counsel, will and hereby do move for an Order, consistent with the terms of the Class Action Settlement in this case, awarding Class Counsel attorneys’ fees of \$466,666, costs in the amount of \$50,000, and Service Payments of \$3,000 to each of the two Class Representatives.

This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Erich P. Schork, the Declaration of Andrew Ferich, the Class Action Settlement Agreement (the “Settlement”) previously filed with the Court (ECF No. 83-1), and all papers filed in support thereof, the argument of counsel at the hearing of this Motion, all papers and records on file in this matter, and such other matters as the Court may consider.

This Motion is made following the conference of counsel pursuant to L.R. 7-3, which took place on March 6, 2026.

Dated: March 27, 2026

Respectfully submitted,

/s/ Andrew W. Ferich

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*Co-Lead Class Counsel*