

1 **S. BRETT SUTTON 143107**
2 **JARED HAGUE 251517**
3 **BRADY BRIGGS 310934**
4 **SUTTON HAGUE LAW CORPORATION, P.C.**
5 5200 North Palm Ave., Suite 203
6 Fresno, CA 93704
7 Telephone: (559) 325-0500
8 Facsimile: (559) 981-1217

9 Attorneys for Plaintiff
10 AARON DICKERSON

11 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
12 **IN AND FOR THE COUNTY OF KERN**

13 * * *

14 AARON DICKERSON, as an individual and on
15 behalf of all others similarly situated,

16 Plaintiff,

17 vs.

18 AERA ENERGY, LLC., a California limited
19 liability company; and DOES 1 through 50,
20 inclusive,

21 Defendants.

Case No. BCV-21-101646

**PLAINTIFF'S AMENDED NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS' FEES AND COSTS**

Date: March 27, 2023

Time: 8:30 a.m.

Dept.: 17

Judge: Hon. Thomas S. Clark

*[To be heard concurrently with
Plaintiff's Motion for Final Approval
of Class Settlement]*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TO ALL DEFENDANTS AND THEIR COUNSEL OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on March 27, 2023, at 8:30 a.m. in Department 17 of this Court, located at **1415 Truxton Avenue, Bakersfield, California 93301**, Plaintiff **AARON DICKERSON** (“Plaintiff”) will, and hereby does, move the Court for, in connection with the final approval of the Parties’ proposed class action settlement:

- 1. An award of reasonable attorneys’ fees in the amount of \$154,984, which is approximately one-third (1/3) of the \$465,000 non-reversionary gross settlement amount; and
- 2. Reimbursement of litigation costs in the amount of \$8,268.91.

This Motion is based upon this Notice, the attached Memorandum of Points and Authorities; the Stipulation of Class Action Settlement and Release filed on October 24, 2022; the concurrently filed declarations of Class Counsel Jared Hague and S. Brett Sutton, and upon such further oral and documentary evidence as may be presented at the time of hearing.

Dated: January 27, 2023

SUTTON HAGUE LAW CORPORATION, P.C.

By: 

JARED HAGUE
Attorney for Plaintiff
AARON DICKERSON

PROOF OF SERVICE

1
2 My business address is **9790 Gateway Drive, Suite 200, Reno, Nevada 89521**. I am
employed in Reno, Nevada. I am over the age of 18 years and am not a party to this case.

3 On the date indicated below, I served the foregoing document(s) described as:

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

6 on all interested parties in this action by placing a true copy thereof enclosed in sealed envelopes
addressed as follows:

7 Jeremy Mittman, Esq.
Alma Silva, Esq.
8 Gabriel Hemphill, Esq.
MITCHELL SILBERBERG & KNUPP LLP
9 2049 Century Park East, 18th Floor
Los Angeles, California 90067
10 Email: j2m@msk.com; als@msk.com; gch@msk.com

11 X (BY U.S. MAIL) I am readily familiar with the business' practice for collection and
12 processing of correspondence for mailing, and that correspondence, with postage thereon
13 fully prepaid, will be deposited with the United States Postal Service on the date noted
below in the ordinary course of business, at Reno, Nevada.

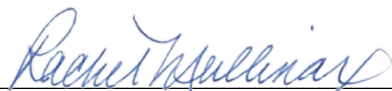
14 _____ (BY PERSONAL SERVICE) I caused such envelopes to be delivered by hand to the
15 office(s) of the addressee(s).

16 X (BY EMAIL) Based on a court order or an agreement of the parties to accept electronic
17 service, I caused the documents to be sent to the persons at the electronic service
addresses listed above from my electronic services address.

18 _____ (BY OVERNIGHT MAIL) I am readily familiar with the business' practice for collection
and processing of correspondence for mailing, and that correspondence will be deposited
19 with an overnight carrier on the date noted below in the ordinary course of business, in
accordance with the overnight carrier’s method for billing for same, and before the last
20 scheduled pick-up time, at Reno, Nevada.

21 **EXECUTED on January 27, 2023, at Reno, Nevada.**

22 X (STATE) I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

23 
24 _____
Rachel Mullinax