

LEVI & KORSINSKY, LLP
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*Lead Counsel for Lead Plaintiff
Dr. Kevin Douglas and the Class*

[Additional counsel on signature page]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DR. KEVIN DOUGLAS, Individually)
and on behalf of all others similarly)
situated,)

Plaintiff,)

vs.)

PLDT INC., MANUEL V.)
PANGILINAN, ALFRED S.)
PANLILIO, ANNABELLE L. CHUA,)
MARILYN A. VICTORIO-AQUINO,)
MA. LOURDES C. RAUSA-CHAN,)
GIL SAMSON D. GARCIA, JUNE)
CHERYL A. CABAL-REVILLA, AND)
JANE BASAS,)

Defendants.)

Case No. 2:23-cv-00885-FLA (MAAx)

CLASS ACTION

LEAD COUNSEL’S NOTICE OF
MOTION AND MOTION FOR AN
AWARD OF ATTORNEYS’ FEES AND
LITIGATION EXPENSES AND FOR AN
AWARD TO LEAD PLAINTIFF

Date: August 9, 2024

Time: 1:30 p.m.

Judge: Hon. Fernando L. Aenlle-Rocha

Courtroom: 6B

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1 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

2 PLEASE TAKE NOTICE that on August 9, 2024, at 1:30 p.m. or at such other
3 time as the Court determines, in Courtroom 6B, the Honorable Fernando L. Aenlle-
4 Rocha, United States District Judge presiding, located at First Street Courthouse, 350
5 W. 1st Street, Los Angeles, California 90012, Lead Counsel, Levi & Korsinsky LLP,
6 will move for an order awarding: (i) Lead Counsel attorneys’ fees in the amount of
7 \$750,000 for securing this favorable result for the Class; (ii) payment of Lead Counsel’s
8 litigation expenses in the amount of \$67,490.63 for expenses reasonably incurred in
9 prosecuting this Action; and (iii) \$5,000 to Lead Plaintiff Dr. Kevin Douglas in
10 recognition of the time and effort he spent representing the Class (“Fee and Expense
11 Application”).

12 This Fee and Expense Application is supported by the Memorandum of Points
13 and Authorities in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees
14 and Litigation Expenses, and for an Award to Lead Plaintiff (“Fee and Expense
15 Memorandum”) submitted herewith, the accompanying Declaration of Shannon L.
16 Hopkins in Support of (1) Lead Plaintiff’s Motion for Final Approval of Class Action
17 Settlement, Approval of the Plan of Allocation, and Final Certification of the Class and
18 (2) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Litigation Expenses
19 and for an Award to Lead Plaintiff (“Hopkins Decl.”), the Declaration of Shannon L.
20 Hopkins on Behalf of Levi & Korsinsky LLP in Support of Lead Counsel’s Motion for
21 an Award of Attorneys’ Fees and Litigation Expenses (“Fee Decl.” attached as Ex. 3 to
22 the Hopkins Decl. and supporting exhibits thereto), the Stipulation of Settlement and its
23 attachments filed with Court on February 16, 2024 (ECF 54-7), and all other pleadings
24 and matters of record. Defendants do not oppose the relief sought in this Motion.

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DATED: June 10, 2024

LEVI & KORSINSKY. LLP

/s/ David C. Jaynes

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*Lead Counsel for Lead Plaintiff Dr. Kevin
Douglas and the Class*

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 10, 2024

/s/ David C. Jaynes
David C. Jaynes

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