

1 Tina Wolfson, CA Bar No. 174806
 2 twolfson@ahdootwolfson.com
 Theodore Maya, CA Bar No. 223242
 3 tmaya@ahdootwolfson.com
 4 **AHDOOT & WOLFSON, PC**
 10728 Lindbrook Drive
 5 Los Angeles, CA 90024
 Telephone: (310) 474-9111
 6 Fax: (310) 474-8585

7
 8 Daniel S. Robinson, CA Bar No. 244245
 drobinson@robinsonfirm.com
 9 Wesley K. Polischuk, CA Bar No. 254121
 wpolischuk@robinsonfirm.com
 10 **ROBINSON CALCAGNIE, INC.**
 11 19 Corporate Plaza Dr.
 Newport Beach, CA 92660
 Telephone: (949) 720-1288
 12 Fax: (949) 720-1292

14 *Interim Co-Lead Counsel for Plaintiffs*
 15 *and the Proposed Class*
 16 [Additional Counsel Listed Below Signatures]

17 **UNITED STATES DISTRICT COURT**
 18 **CENTRAL DISTRICT OF CALIFORNIA**
 19 **SOUTHERN DIVISION**

20 **IN RE EXPERIAN DATA BREACH**
 21 **LITIGATION**

Case No. 8:15-cv-01592 AG (DFMx)

Hon. Andrew J. Guilford

22 **NOTICE OF MOTION AND**
 23 **MOTION FOR PRELIMINARY**
 24 **APPROVAL**

25 Date: December 3, 2018

Time: 10:00 a.m.

26 Room: Court 10D

27 [Filed Concurrently with Memorandum,
 28 Declarations and Preliminary Approval
 Order]

1 PLEASE TAKE NOTICE that Plaintiffs,¹ through their undersigned counsel,
2 hereby move this Court to grant Plaintiffs’ Motion for Preliminary Approval of Class
3 Action Settlement. The hearing on this matter will be held on December 3, 2018, at
4 10:00 a.m. in Courtroom 10D located at the United States District Court, Central
5 District of California, Ronald Reagan Federal Building, 411 West 4th Street, Room
6 1053 Santa Ana, CA 92701.

7 Plaintiffs bring this Motion pursuant to Rule 23 of the Federal Rules of Civil
8 Procedure and respectfully request that the Court preliminarily approve the Parties’
9 Settlement Agreement and for entry of an Order:

10 (1) certifying a nationwide Class for settlement purposes only pursuant
11 to Rules 23(a) and 23(b)(3) of the Federal Rules of Civil Procedure;

12 (2) preliminarily approving the Settlement, including the attached Class
13 Action Settlement Agreement and Release and all exhibits thereto;

14 (3) appointing Plaintiffs as Class Representatives;

15 (4) appointing Tina Wolfson of Ahdoot & Wolfson, PC and Daniel S.
16 Robinson of Robinson Calcagnie, Inc. as Class Counsel;

17 (5) appointing KCC, LLC as Settlement Administrator to administer the
18 notice procedure and the processing of claims;

19 (6) approving the Notice plan and authorizing the dissemination of
20 Notice to the Class;

21 (7) setting a date and procedures for a Fairness Hearing on the proposed
22

23 ¹ Plaintiffs Stephen Allen, Richard Parks, Ryan Hamre, Joshua Gonzales, Gwendolyn Crump,
24 Elleen Brazzle, Melissa Merry, Francisco Ojeda, Nora Bohannon, Gregory and Kashia Johnson,
25 David Ciano, Bradford Daghita, Alison Cochran, Alice Dunscomb, Samantha Manganaris,
26 Veronica Gillotte, David Brown, Stuart Zimmelman, Chris Shearer, Christiaan Mealey, Gregory
27 Hertik, Allan Sommercorn, Kamil Kuklinski, Charles Yoo, Sergey Barbashov, Kathleen Alcorn,
28 Mary Roberts, Tony George, Ryan Heitz, Gerardus Jansen, Lorenzo Jackson, Eban Liebig, Angelia
Fennern, Charles Sallade, Cregan Smith, Giovanni Williams, Dipak Bhuta, Joseph Zubrzycki,
Lucio Hernandez, Shivan Bassaw, Jennifer Looney, Darius Clark, Hunter Graham, Philip Popiel,
John Reiser, Jennifer Brandabur, Perry Heath, David Lumb, Martha Cebrian-Vega, Mark and Daisy
Hodson, Amjed Ababseh, Martha Schroeder, Jason Shafer, Nathaniel Apan, Jeffrey Gutschmidt are
collectively referred to as “Plaintiffs” or “Class Representatives.”

1 Settlement;

2 (8) setting forth procedures and deadlines for Class Members to file
3 objections to the proposed Settlement;

4 (9) setting forth procedures and deadlines for Class Members to appear
5 at the Final Fairness Hearing;

6 (10) setting forth procedures and deadlines for Class Members to request
7 exclusion from the Class;

8 (11) setting forth procedures and deadlines for Class Members to submit
9 Claim Forms; and

10 (12) staying all non-Settlement related proceedings in the above-
11 captioned case pending final approval of the Settlement.

12 Plaintiffs' Motion is based on this Notice of Motion, the accompanying
13 Memorandum of Points and Authorities and all attachments and exhibits thereto
14 (including supporting declarations and the Settlement Agreement) and all pleadings,
15 records and other papers filed in this action.

16
17 Dated: November 12, 2018

18 **AHDOOT & WOLFSON**

ROBINSON CALCAGNIE, INC.

19
20 By: /s/ Tina Wolfson
Tina Wolfson

By: /s/ Daniel S. Robinson
Daniel S. Robinson

21
22 *Interim Co-Lead Counsel for the Class*

23 Sherrie Savett, Esq.
24 **BERGER & MONTAGUE PC**
1622 Locust Street
25 Philadelphia, PA 19103
26 Tel: (215) 875-3000
Fax: (215) 875-4604
27 ssavett@bm.net

Daniel C. Girard, Esq.
28 **GIRARD SHARP LLP**
601 California Street, Suite 1400
San Francisco, CA 94108
Tel: (415) 981-4800
Fax: (415) 981-4846
dgirard@girardsharp.com

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

Cari Campen Laufenberg, Esq.
KELLER ROHRBACK, LLP
1201 Third Avenue, Suite 3200
Seattle, WA 98101-3052
Tel: (206) 623-1900
Fax: (206) 623-3384
claufenberg@kellerrohrback.com

Christopher P. Ridout, Esq.
ZIMMERMAN REED, LLP
2381 Rosecrans Avenue, Suite 328
Manhattan Beach, CA 90245
Tel: (877) 500-8780
Fax: (877) 500-8781
christopher.ridout@zimmreed.com

Joseph N. Kravec, Jr., Esq.
**FEINSTEIN, DOYLE, PAYNE &
KRAVEC, LLC**
Law & Finance Building, 13th Floor
429 Fourth Avenue
Pittsburgh, PA 15219
Tel: (412) 281-8400
Fax: (412) 281-1007
jkravec@fdpklaw.com

Andrew P. Bell, Esq.
LOCKS LAW FIRM
801 N. Kings Highway
Cherry Hill, NJ 08034
Tel: (856) 663-8200
Fax: (856) 661-8400
abell@lockslaw.com

Plaintiffs' Steering Committee

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

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2018, I caused to be filed the foregoing document. This document is being filed electronically using the Court’s electronic case filing (ECF) system, which will automatically send a notice of electronic filing to the email addresses of all counsel of record.

Dated: November 12, 2018 /s/ Daniel S. Robinson
Daniel S. Robinson