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9 *Attorneys for Plaintiff and Class Counsel*

11 **SUPERIOR COURT OF CALIFORNIA**

12 **COUNTY OF SAN DIEGO**

13 MARION WILLIAMS, on behalf of himself and  
all others similarly situated,

14 Plaintiff,

15 v.

16 UDEMY, INC., a Delaware limited liability  
17 company, and DOES 1- 50, inclusive,

18 Defendants.

Case No. 37-2023-00003666-CU-BT-NC

[E-FILE]

**CLASS ACTION**

**PLAINTIFF'S NOTICE OF UNOPPOSED  
MOTION AND MOTION FOR  
ATTORNEYS' FEES, COSTS, AND  
INCENTIVE AWARD**

Date: July 28, 2023

Time: 1:30 P.M.

Judge: Robert P. Dahlquist

Dept: N-29

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego

**06/30/2023** at 12:44:00 PM

Clerk of the Superior Court  
By Veronica Navarro, Deputy Clerk

1           **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

2           On April 21, 2023, the Honorable Robert P. Dahlquist granted preliminary approval of the class  
3 action Settlement Agreement<sup>1</sup> in this matter, and set a Final Fairness Hearing to be held on July 28, 2023,  
4 at 1:30 p.m. At the Final Fairness Hearing, or as soon thereafter as counsel can be heard in Department N-  
5 29 of the above-entitled Court, Plaintiff will, and hereby does, move for an Order Awarding Attorneys'  
6 Fees, Costs, and Incentive Award.

7           Class Counsel requests an award of \$1,000, 000.00 in attorneys' fees and costs to be approved by  
8 this Court. Importantly, the requested fees and costs will be paid out separately and apart from any benefits  
9 paid to the Class. Plaintiff also requests an incentive award of \$2,500 to Plaintiff, Marion Williams, as  
10 agreed to by Defendant, in recognition of his risk in commencing this case and his efforts in litigating this  
11 Action.

12           Therefore, Plaintiff, on behalf of himself and the Class, submits this unopposed motion based upon  
13 the memorandum of points and authorities in support of the motion filed herewith, the concurrently filed  
14 declaration of Todd D. Carpenter, and the records and files in this Action, and such arguments as may be  
15 presented at the hearing on this motion.

16 Dated: June 30, 2023

**LYNCH CARPENTER, LLP**

17 By: */s/Todd D. Carpenter*

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27 \_\_\_\_\_  
28 <sup>1</sup> All capitalized terms, unless otherwise defined, have the same definition as those terms in the Settlement Agreement and Release.