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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

STEVE CHAMBERS, *et al.*, in their
individual capacities and on behalf of
all others similarly situated,

Plaintiffs,

v.

WHIRLPOOL CORPORATION, *et al.*,

Defendants.

Case No. 8:11-cv-01733-FMO (JCGx)

**PLAINTIFFS' RENEWED
MOTION FOR ATTORNEYS
FEES AND PAYMENT OF
UNREIMBURSED LITIGATION
EXPENSES**

The Honorable Fernando M. Olguin

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that on July 15, 2021, at 10:00 am, or as soon
4 thereafter as the matter may be heard before the Honorable Fernando M. Olguin, in
5 Courtroom 22 of the United States District Court, located at 312 North Spring Street,
6 Los Angeles, California 90012, Plaintiffs and Class Counsel in the above captioned
7 matter will, and hereby do, move the Court for an Order awarding attorneys’ fees in
8 the amount of \$8,419,934.89 and reimbursement of expenses in the amount of
9 \$80,065.11.¹

10 As discussed in the accompanying memorandum, the amounts requested are
11 fair, reasonable and appropriate under applicable law, and are well-justified in this
12 case, and consistent with the Ninth Circuit’s guidance in *Chambers v. Whirlpool*
13 *Corp.*, 980 F.3d 645, 666 (9th Cir. 2020). This Motion is based on the accompanying
14 Memorandum of Points and Authorities, the supporting declarations and exhibits
15 filed concurrently herewith, all pleadings and documents on file, and such evidence
16 and arguments as may properly come before the Court.

17 As reflected at ECF 407, Defendants consent to the motion and agree that the
18 negotiated amount for attorneys’ fees and reimbursement of expenses “is consistent
19 with the Ninth Circuit’s mandate.”

20
21 DATED: June 16, 2021

Respectfully submitted,

22 /s/ Steven A. Schwartz
23 Steven A. Schwartz (*pro hac vice*)
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28 ¹ These expenses are in addition to the \$508,292.67 previously awarded by the Court on October 11, 2016 (ECF 351).

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Steven A. Schwartz
Steven A. Schwartz