

1 EILEEN R. RIDLEY (SBN 151735)
2 *eridley@foley.com*
3 **FOLEY & LARDNER LLP**
4 555 California Street, Suite 1700
5 San Francisco, CA 94104-1520
6 Telephone: (415) 434-4484
7 Facsimile: (415) 434-4507

RONALD A. MARRON (SBN 175650)
ron@consumersadvocates.com
LAW OFFICES OF
RONALD A. MARRON, APLC
651 Arroyo Drive
San Diego, California 92103
Telephone: (619) 696-9006
Facsimile: (619) 564-6665

ROBERT L. TEEL (SBN 127081)
lawoffice@rlteel.com
LAW OFFICE OF ROBERT L.
TEEL
1425 Broadway, Mail Code: 20-6690
Seattle, Washington 98122
Telephone: (866) 833-5529
Facsimile: (855) 609-6911

Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JUAN ROMERO, FRANK
TISCARENO, and KENNETH ELLIOTT
on behalf of themselves and all others
similarly situated,

Plaintiff(s),

vs.

SECURUS TECHNOLOGIES, INC.,

Defendant(s).

Case No.: 16-CV-1283-JM-MDD
NOTICE OF MOTION AND
MOTION FOR LITIGATION COSTS,
INCENTIVE AWARDS, AND
ATTORNEYS' FEES

Date: September 28, 2020
Time: 10:00 AM
Courtroom: 5D
Judge: Hon. Jeffrey T. Miller

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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on September 28, 2020 at 10:00 AM or as soon thereafter as this matter may be heard before the Honorable Jeffrey T. Miller, in Courtroom 5D of the Edward J. Schwartz United States Courthouse, located in Suite 5190, 221 West Broadway, San Diego, California 92101, Plaintiffs Kenneth Elliott, Juan Romero, and Frank Tiscareno (“Plaintiffs”) will, and hereby do, move this Court for litigations costs, incentive awards, and attorneys’ fees.

Plaintiffs’ counsel have conferred with counsel for Defendant who do not oppose this motion. This motion is based on upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points and Authorities, Declarations of Ronald A. Marron, Eileen Ridley, Robert Teel, Juan Romero, Kenneth Elliott, and Frank Tiscareno; (3) the Settlement Agreement; (4) the pleadings and papers on file in this action; and (5) such other written or oral argument as may be presented to the Court.

Respectfully submitted, August 17, 2020

By: /s/ Ronald A. Marron
Ronald A. Marron

THE LAW OFFICE OF RONALD A. MARRON
Ronald A. Marron

LAW OFFICE OF ROBERT L. TEEL
Robert L. Teel

FOLEY & LARDNER LLP
Eileen R. Ridley

*Attorneys for Plaintiffs Juan Romero,
Frank Tiscareno, and Kenneth Elliot*