

1 **LYNCH CARPENTER, LLP**

Todd D. Carpenter (234464)

2 todd@lcllp.com

3 Scott G. Braden (305051)

scott@lcllp.com

1234 Camino del Mar

4 Del Mar, CA 92014

Tel: 619.762.1910

5 Fax: 858.313.1850

6 *Attorneys for Plaintiff
and Class Counsel*

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

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Clerk of the Superior Court
By V. Navarro ,Deputy Clerk

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF SAN DIEGO**

10 TRISHA TEPERSON, on behalf of herself and all
11 others similarly situated,

12 Plaintiff,

13 v.

14 NOGIN, INC., a Delaware Corporation,
15 JUSTICE BRAND HOLDINGS, LLC, a New
16 York Limited Liability Company, BLUESTAR
17 ALLIANCE LLC, a New York Limited Liability
18 Company, B. RILEY SECURITIES, INC., a
19 Delaware Corporation, and B. RILEY
20 PRINCIPAL INVESTMENTS, LLC, a Delaware
21 Limited Liability Company, and DOES 1- 50,
22 inclusive,

23 Defendants.

Case No. 37-2023-00041084-CU-NP-NC

[E-FILE]

CLASS ACTION

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

Date: February 21, 2025

Time: 1:30 P.M.

Judge: Hon. Cynthia A. Freeland

Dept: N-27

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

2 On November 1, 2024, the Honorable Cynthia A. Freeland granted preliminary approval of the
3 class action Settlement Agreement¹ in this matter, and set a Final Fairness Hearing to be held on
4 February 21, 2025, at 1:30 p.m. (ROA No. 81.) At the Fairness Hearing, or as soon thereafter as counsel
5 can be heard in Department N-27 of the above-entitled Court, Plaintiff will, and hereby does, move for an
6 Order Awarding Attorneys' Fees, Costs, and Incentive Award.

7 Class Counsel requests an award of \$600,000.00 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, Trisha Teperson, as
10 agreed to by Defendants, in recognition of her risk in commencing this case and her efforts in litigating
11 this Action.

12 Therefore, Plaintiff, on behalf of herself 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: December 31, 2024

LYNCH CARPENTER, LLP

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

Todd D. Carpenter (234464)

todd@lcllp.com

18 Scott G. Braden (305051)

scott@lcllp.com

19 1234 Camino del Mar

20 Del Mar, CA 92014

Tel: 619.762.1910

21 Fax: 858.313.1850

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28 ¹ All capitalized terms, unless otherwise defined, have the same definition as those terms in the Settlement Agreement and Release. (See ROA No. 75, Ex. 1.)