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on behalf of themselves and others similarly situated  
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Attorneys for Plaintiff Larry Tran, on behalf of himself and  
others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

LARRY TRAN, ROBERTO MORAN, and  
OSIE MARSHALL, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

GOOD HEALTH NATURAL PRODUCTS,  
INC., a Delaware corporation,

Defendant.

Case Nos. BC561427; BC588986 (related)

*Assigned for all purposes to the  
Hon. Daniel J. Buckley, Dept. 1*

CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION  
AND MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT,  
AND FOR AWARD OF ATTORNEYS'  
FEES AND COSTS TO CLASS  
COUNSEL AND INCENTIVE AWARD  
TO THE CLASS REPRESENTATIVES**

Hearing Date: January 14, 2020  
Time: 9:00 a.m.  
Dept.: 1

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on January 14, 2020, at 9:00 a.m., or as soon thereafter as  
3 this matter may be heard in Department 1 of the above-entitled Court, located at 312 North Spring  
4 Street, Los Angeles, California 90012, Plaintiffs Larry Tran, Roberto Moran, and Osie Marshall  
5 (collectively, “Plaintiffs”), on behalf of themselves and all persons similarly situated (“Settlement  
6 Class Members”), will and hereby do move this Court, pursuant to California Code of Civil  
7 Procedure § 382, California Civil Code § 1781, and California Rule of Court 3.769, for an order and  
8 judgment granting final approval of the proposed class action settlement on the terms and conditions  
9 set forth in the Amended Stipulation of Class Action Settlement (“Agreement”)<sup>1</sup> and awarding  
10 attorneys’ fees and costs to Class Counsel and an incentive award to each of the Class  
11 Representatives.

12 Plaintiffs further move the Court for an order and judgment:

- 13 1. Confirming its previous findings that the requirements for class certification, for  
14 settlement purposes, are satisfied;
- 15 2. Certifying the Settlement Class for settlement purposes;
- 16 3. Appointing Plaintiffs Larry Tran, Roberto Moran, and Osie Marshall as the Class  
17 Representatives for the Settlement Class;
- 18 4. Appointing CounselOne, P.C. and Chant & Company A Professional Law  
19 Corporation as Class Counsel for the Settlement Class;
- 20 5. Appointing Atticus Administration, LLC as the Claims Administrator.
- 21 6. Finding that the settlement is fair, adequate and reasonable and complies with  
22 California Code of Civil Procedure § 382, California Civil Code Section 1781, and  
23 California Rules of Court Rule 3.769;
- 24 7. Finding that the notice of settlement directed to the Settlement Class Members has  
25 been completed in conformity with the Court’s orders;
- 26 8. Binding all Settlement Class Members who did not timely exclude themselves from  
27 the settlement to the Agreement, including the release contained in the Agreement;

28 <sup>1</sup> Capitalized terms shall have the same meanings as in the Agreement, unless indicated otherwise.

- 1           9.     Directing the Parties and the Claims Administrator to effectuate all terms of the  
2           Agreement;
- 3           10.    Awarding to Class Counsel, Counsel One, P.C. and Chant & Company A  
4           Professional Law Corporation, reasonable attorneys' fees in the amount of  
5           \$333,333.33, to be paid from the Settlement Fund, and to be divided 50% to Counsel  
6           One, P.C. and 50% to Chant & Company A Professional Law Corporation;
- 7           11.    Awarding costs to Class Counsel of \$6,912.75 to Counsel One, P.C. and \$5,741.13 to  
8           Chant & Company A Professional Law Corporation, to be paid from the Settlement  
9           Fund; and
- 10          12.    Awarding \$3,333.33 to each of the Class Representatives, to paid from the Settlement  
11          Fund, as an incentive (service) award to compensate each of them for their services as  
12          the representatives of the Settlement Class.

13

14           This Notice of Motion and Motion is based on this Notice, the Agreement; the accompanying  
15    Memorandum of Points and Authorities filed herewith; the Declarations of Anthony J. Orshansky,  
16    Chant Yedalian and Christopher Longley; the pleadings, records, and files in the case; and such  
17    other further oral and documentary evidence which may be submitted at or before the hearing on this  
18    Motion.


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Dated: December 17, 2019

Respectfully submitted,

**COUNSELONE, PC**

By   
Anthony J. Orshansky  
Justin Kachadoorian  
Attorneys for Plaintiffs Roberto Moran and  
Osie Marshall

**CHANT & COMPANY**  
**A Professional Law Corporation**

By:   
Chant Yedalian  
Attorneys for Plaintiff Larry Tran