

1 Laura L. Ho (SBN 173179)  
lho@gbdhlegal.com  
2 Anne P. Bellows (SBN 293722)  
abellows@gbdhlegal.com  
3 Stephanie E. Tilden (SBN 341486)  
stilden@gbdhlegal.com  
4 GOLDSTEIN, BORGEN, DARDARIAN & HO  
155 Grand Avenue, Suite 900  
5 Oakland, CA 94612  
Tel: (510) 763-9800 | Fax: (510) 835-1417

6 Jesse Newmark (SBN 247488)  
jessnewmark@centrolegal.org  
7 CENTRO LEGAL DE LA RAZA  
3400 E. 12th Street  
8 Oakland, CA 94601  
Tel: (510) 437-1863

9 Lindsay Nako (SBN 239090)  
lnako@impactfund.org  
10 Lori Rifkin (SBN 244081)  
lrifkin@impactfund.org  
11 Fawn Rajbhandari-Korr (SBN 315888)  
fkorr@impactfund.org  
12 Meredith Dixon (SBN 346864)  
mdixon@impactfund.org  
13 IMPACT FUND  
2080 Addison Street, Suite 5  
14 Berkeley, CA 94704  
Tel: (510) 845-3473 | Fax: (510) 845-3654

15 Attorneys for Plaintiffs and Relators and the Certified Classes  
16 *[Additional Counsel for Relators listed on following page]*

17 **UNITED STATES DISTRICT COURT**  
18 **EASTERN DISTRICT OF CALIFORNIA**  
19 **SACRAMENTO DIVISION**

20 UNITED STATES OF AMERICA, *ex rel.*  
DENIKA TERRY, ROY HUSKEY III, and  
21 TAMERA LIVINGSTON, and each of them for  
themselves individually, and for all other persons  
22 similarly situated and on behalf of the UNITED  
STATES OF AMERICA

23 Plaintiffs/Relators,

24 vs.

25 WASATCH ADVANTAGE GROUP, LLC,  
WASATCH PROPERTY MANAGEMENT, INC.,  
26 WASATCH POOL HOLDINGS, LLC,  
CHESAPEAKE APARTMENT HOLDINGS, LLC,  
27 LOGAN PARK APARTMENTS, LLC, LOGAN  
PARK APARTMENTS, LP, ASPEN PARK  
28 HOLDINGS, LLC, BELLWOOD JERRON  
HOLDINGS, LLC, BELLWOOD JERRON

Case No.: 2:15-CV-00799-KJM-SCR

CLASS ACTION

**NOTICE OF MOTION AND MOTION FOR  
REASONABLE ATTORNEYS' FEES,  
COSTS, AND EXPENSES**

Date: January 23, 2025

Time: 10:00 a.m.

Dept: Courtroom 3, 15th Floor

Before: Hon. Chief Judge Kimberly J. Mueller

Trial Date: July 30, 2024

1 APARTMENTS, LP, BENT TREE  
APARTMENTS, LLC, CALIFORNIA PLACE  
2 APARTMENTS, LLC, CAMELOT LAKES  
HOLDINGS, LLC, CANYON CLUB HOLDINGS,  
3 LLC, COURTYARD AT CENTRAL PARK  
APARTMENTS, LLC, CREEKSIDE HOLDINGS,  
4 LTD, HAYWARD SENIOR APARTMENTS, LP,  
HERITAGE PARK APARTMENTS, LP, OAK  
5 VALLEY APARTMENTS, LLC, OAK VALLEY  
HOLDINGS, LP, PEPPERTREE APARTMENT  
6 HOLDINGS, LP, PIEDMONT APARTMENTS,  
LP, POINT NATOMAS APARTMENTS, LLC,  
7 POINT NATOMAS APARTMENTS, LP, RIVER  
OAKS HOLDINGS, LLC, SHADOW WAY  
8 APARTMENTS, LP, SPRING VILLA  
APARTMENTS, LP, SUN VALLEY HOLDINGS,  
9 LTD, VILLAGE GROVE APARTMENTS, LP,  
WASATCH QUAIL RUN GP, LLC, WASATCH  
10 PREMIER PROPERTIES, LLC, WASATCH  
POOL HOLDINGS III, LLC,  
11 and DOES 1-4,

12 Defendants.

13  
14 Andrew Wolff (SBN 195092)  
andrew@awolfflaw.com  
LAW OFFICES OF ANDREW WOLFF, PC  
15 1615 Broadway, 4th Floor  
Oakland, CA 94612  
16 Tel: (510) 834-3300 | Fax: (510) 834-3377

17 Attorneys for Plaintiffs and Relators and the Certified Classes

18  
19 Lawrence Anthony Organ (SBN 175503)  
larry@civilrightsca.com  
CALIFORNIA CIVIL RIGHTS LAW GROUP  
20 332 San Anselmo Avenue  
San Anselmo, CA 94960-2610  
21 Tel: (415) 453-4740 | Fax: (415) 785-7352

22 Attorneys for Relators  
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**NOTICE OF MOTION AND MOTION**

PLEASE TAKE NOTICE that on January 23, 2025, in Courtroom 3 of the United States District Court for the Eastern District of California, located at 501 I Street, Sacramento, California 95814, Plaintiffs will and hereby do move the Court for an award of reasonable attorney fees, costs and expenses related to the Class Claims pursuant to the Court’s order preliminarily approving the class settlement (ECF No. 562), Federal Rule of Civil Procedure 23(h), California Civil Code § 1780(e), California Civil Procedure Code § 1021.5, and Class Members’ leases. This motion is based upon this notice of motion and motion; the memorandum of points and authorities in support thereof; the Declarations of Anne Bellows, Jesse Newmark, Andrew Wolff, and Lindsay Nako; the other records, pleadings, and papers filed in this case; and such other evidence or argument that may be presented at the hearing on this motion.

Dated: December 20, 2024

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/ Anne P. Bellows

Anne P. Bellows

Attorneys for Plaintiffs and Relators  
and the Certified Classes