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By T. Automation , Deputy Clerk

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13 *Attorneys for Plaintiffs and Class Counsel*

14 **SUPERIOR COURT OF CALIFORNIA**
15 **COUNTY OF SAN DIEGO**

16 JEFFREY JACOBS and MADELINE CASEY,
17 on behalf of themselves and all others similarly
situated,

18 Plaintiffs,

19 vs.

20 LA-Z-BOY INCORPORATED, a Michigan
21 corporation, STITCH INDUSTRIES INC., a
Delaware corporation,

22 Defendants.

Case No. 25CU038051N

[E-FILE]

CLASS ACTION

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

Date: March 6, 2026

Time: 1:30 p.m.

Judge: Hon. Michael D. Washington

Dept: N-31

24 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD: On October 31, 2025,
25 the Honorable Michael D. Washington granted preliminary approval of the class action Settlement
26 Agreement¹ in this matter. The Final Fairness Hearing is scheduled for March 6, 2026, at 1:30 p.m. (ROA
27

28 ¹ All capitalized terms, unless otherwise defined have the same definition as those terms in the
Settlement Agreement and Release. (See ROA No. 16, Ex. 1.)

1 No. 26.) At the Fairness Hearing, or as soon thereafter as counsel can be heard in Department N-31 of the
2 above-entitled Court, Plaintiffs Jeffrey Jacobs and Madeline Casey (“Plaintiffs”) will, and hereby do,
3 move for an Order Awarding Attorneys’ Fees, Costs, and Incentive Award.

4 Class Counsel requests an award of \$1,325,000, which includes Class Counsel’s attorneys’ fees
5 and recoverable costs, an Incentive Award in the amount of \$7,500 for each named Plaintiff, and all Claims
6 Administrator Costs, to be paid by Defendants La-Z-Boy Incorporated and Stitch Industries Inc.
7 (collectively “Defendant” or “Joybird”) subject to Court approval. Importantly, the requested fees and
8 costs will be paid out separately and apart from any benefits paid to the Class. The requested incentive
9 award of \$7,500 to each Plaintiff, as agreed by Defendant, is in recognition of their risk in commencing
10 this case and their efforts in litigating this Action.

11 Therefore, Plaintiffs, on behalf of themselves and the Class, submit this unopposed motion based
12 upon the Memorandum of Points and Authorities in support of the Motion, filed herewith, the concurrently
13 filed Declarations of Todd D. Carpenter and Simon Franzini, the records and files in this Action, and such
14 arguments as may be presented at the hearing on this Motion.

15
16 Dated: January 29, 2026

LYNCH CARPENTER, LLP

17 By: /s/ Todd D. Carpenter

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