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11 Attorneys for Plaintiffs  
12 JANE DOE I and JANE DOE II

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **COUNTY OF SACRAMENTO**

15 JANE DOE I and JANE DOE II, on behalf of  
themselves and all others similarly situated,  
16  
17 Plaintiffs,  
18 v.  
19 SUTTER HEALTH,  
20 Defendant.

Case No. 34-2019-00258072-CU-BT-GDS

CLASS ACTION

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, COSTS AND  
INCENTIVE AWARDS**

Date: February 27, 2026  
Time: 9:00 a.m.  
Dept.: 22  
Judge: Hon. Lauri A. Damrell

Reservation Number: A-258072-039

Action Filed: June 10, 2019  
Trial Date: None Set

1 **[PROPOSED] ORDER**

2 This matter having come before the Court on February 27, 2026, the Court having considered  
3 all papers filed and proceedings held in connection with Plaintiffs’ Motion for Attorneys’ Fees, Costs  
4 and Incentive Awards, and notice having been given to the Class as required by the Court’s October  
5 15, 2025 Preliminary Approval Order, and good cause appearing, the Court, HEREBY ORDERS AS  
6 FOLLOWS:

7 1. The Court, for purposes of this Order, adopts the terms and definitions set forth in the  
8 Settlement Agreement unless modified herein;

9 2. The Court has jurisdiction over the subject matter of this action and over all parties to  
10 it including all members of the Settlement Class;

11 3. Notice of the attorneys’ fees, costs and incentive awards to be sought by Plaintiffs, as  
12 well as Settlement Administrator costs, was provided to Settlement Class Members in a reasonable  
13 manner, and such Notice complied with all applicable laws, statutes and rules as well as this Court’s  
14 October 15, 2025 Order.

15 4. The Court having reviewed the fee submissions which included not just summaries of  
16 the time expended but also the individual time entries lodged with the Court, finds that Kiesel Law  
17 LLP and Simmons Hanly Conroy LLP’s (“Class Counsel”) lodestar, based on their hourly rates,  
18 reasonable and appropriate based upon the amount of work performed by Class Counsel, the novelty  
19 and difficulty of this action, Class Counsel’s skill and effort in dealing with the complex issues  
20 presented by this case, the substantial benefit obtained for the Class, the risk of the litigation, and  
21 public policy considerations. Class Counsel is hereby awarded attorneys’ fees in the amount of  
22 \$ \_\_\_\_\_. The Court finds the fee award in line with other settlements of this nature.  
23 The Court has confirmed the reasonableness of the fee request by conducting a lodestar cross-check.  
24 Furthermore, Class Counsel has advised that they expect to perform more work even after entry of  
25 the instant order.

26 5. The Court also finds that Class Counsel have incurred unreimbursed litigation costs.  
27 All of these costs were reasonably incurred in the ordinary course of prosecuting this case and  
28 necessary given the complex nature and scope of the case. The Court finds that Class Counsel are

1 entitled to be reimbursed for these costs in the amount of \$ \_\_\_\_\_.

2           6.       The Court further approves an incentive award of \$ \_\_\_\_\_ to each of the Class  
3 Representatives, Plaintiffs Jane Doe I and Jane Doe II (“Plaintiffs”). These incentive awards are  
4 justified by: (i) the risks Plaintiffs faced in bringing this lawsuit; (ii) the amount of time and effort  
5 spent on this case by Plaintiffs; and (iii) the benefits Plaintiffs helped obtain for the Settlement Class.

6           7.       The Court also finds that Epiq Class Action & Claims Solutions, Inc. has performed  
7 the notice and claims administration services so as to effectuate the terms of the Settlement and as  
8 ordered this Court. As a result, Epiq’s fees and expenses in the amount of \$ \_\_\_\_\_ is hereby  
9 approved as being reasonably incurred in the ordinary course of administration and necessary for the  
10 administration of the settlement, including provision of notice to the Class, among other things.

11           8.       The attorneys’ fees, costs and incentive awards set forth in this Order shall be paid and  
12 distributed in accordance with the terms of the Settlement Agreement and the agreement between  
13 counsel.

14           **IT IS SO ORDERED.**

15

16 DATED: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE LAURI A. DAMRELL  
JUDGE OF THE SUPERIOR COURT

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 8648 Wilshire Boulevard, Beverly Hills, CA 90211-2910.

On December 9, 2025, I served true copies of the following documents described as **[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND INCENTIVE AWARDS** on the interested parties in this action as follows:

Robert H. Bunzel  
Michael D. Abraham  
Stephen C. Steinberg  
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*Attorneys for Defendant Sutter Health*

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent by e-mail to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 9, 2025, at Beverly Hills, California.

  
\_\_\_\_\_  
Jessica Mendez