

1 Adam J. Levitt  
2 **DICELLO LEVITT LLP**  
3 Ten North Dearborn Street, Sixth Floor  
4 Chicago, Illinois 60602  
5 Telephone: 312-214-7900  
6 alevitt@dicellolevitt.com

7 H. Clay Barnett III  
8 **BEASLEY, ALLEN, CROW,**  
9 **METHVIN, PORTIS & MILES, P.C.**  
10 272 Commerce Street  
11 Montgomery, Alabama 36104  
12 Telephone: 334-269-2343  
13 Clay.Barnett@BeasleyAllen.com

Andrew Traylor  
**ANDREW T. TRAILOR, P.A.**  
9990 Southwest 77 Avenue, PH 12  
Miami, Florida 33156  
Telephone: 305-668-6090  
andrew@attlawpa.com

14 *Class Counsel*  
15 *(Additional counsel listed on the signature page)*

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 In re HONDA IDLE STOP  
19 LITIGATION

20 This Document Relates to:  
21 ALL ACTIONS

22 Master File No.: 2:22-cv-04252-MCS-SK

23 CONSOLIDATED ACTION

24 **PLAINTIFFS' NOTICE OF MOTION**  
25 **AND MOTION FOR ATTORNEYS'**  
26 **FEEES, EXPENSES, AND SERVICE**  
27 **AWARDS**

28 [Filed Concurrently with [Proposed]  
Order

Hearing Date: May 18, 2026  
Courtroom: 7C  
Time: 9:00 a.m.

**NOTICE OF MOTION AND MOTION**

TO THIS COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on May 18, 2026, at 9:00 a.m., in the United States District Court, Central District of California, First Street Courthouse, located at 350 W. 1st Street, Courtroom 7C, before the Honorable Mark C. Scarsi, Plaintiffs will, and hereby do, move this Court, pursuant to Federal Rule of Civil Procedure 23 for an entry of order awarding Class Counsel \$35,250,000.00 in attorneys’ fees, reimbursement of Class Counsel’s reasonable out-of-pocket expenses of no less than \$823,131.24, and awarding service awards of \$7,500.00 each to Plaintiffs Kevin Bishop, Janice Stewart, Brandon Derry, Jeff Kaminski, Devron Elliot, Marilyn Thomas, Daniel Rock, Antoinette Lanus, Sirous Pourjafar, Melissa Howell, David Jew, Sharon Marie Johnson, Liz Simpson, Hamid Balooki, Malik Barrett, Sean Crary, Sadia Durrani, Abby O’Neill, Latasha Ransome, and Ali Qureshi.

Plaintiffs bring this motion on the grounds that: (a) the requested award of attorneys’ fees is reasonable when considered under the factors set forth in *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043 (9th Cir. 2002); (b) the expenses incurred by Class Counsel in this Action were reasonable and should be reimbursed; and (c) the requested service awards are reasonable in light of Plaintiffs’ service in representing the Class.

This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the accompanying Joint Declaration of Class Counsel, and all pleadings, records, and papers on file with the Court in this Action.

DATED: March 23, 2026

By: /s/ H. Clay Barnett, III

H. Clay Barnett III (*pro hac vice*)  
W. Daniel “Dee” Miles III (*pro hac vice*)  
Demet Basar (*pro hac vice*)  
J. Mitch Williams (*pro hac vice*)  
Rebecca D. Gilliland (*pro hac vice*)  
Dylan T. Martin (*pro hac vice*)  
Trent H. Mann (*pro hac vice*)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**BEASLEY, ALLEN, CROW,  
METHVIN, PORTIS & MILES,  
P.C.**

272 Commerce Street  
Montgomery, Alabama 36104  
Telephone: 334-269-2343  
Dee.Miles@BeasleyAllen.com  
Clay.Barnett@BeasleyAllen.com  
Demet.Basar@BeasleyAllen.com  
Mitch.Williams@BeasleyAllen.com  
Rebecca.Gilliland@BeasleyAllen.com  
Dylan.Martin@BeasleyAllen.com  
Trent.Mann@BeasleyAllen.com

Adam J. Levitt  
John E. Tangren  
Daniel R. Ferri  
**DICELLO LEVITT LLP**  
Ten North Dearborn Street, Sixth Floor  
Chicago, Illinois 60602  
Telephone: 312-214-7900  
alevitt@dicellolevitt.com  
jtangren@dicellolevitt.com  
dferri@dicellolevitt.com

Andrew T. Traylor  
**ANDREW T. TRAILOR, P.A.**  
9990 Southwest 77 Avenue, PH 12  
Miami, Florida 33156  
Telephone: 305-668-6090  
andrew@attlawpa.com

***Class Counsel***

1 **Certificate of Service**

2 I hereby certify that on March 23, 2026, I electronically filed the foregoing  
3 document using the Court’s electronic filing system, which will notify all counsel of  
4 record authorized to receive such filings.

5  
6 /s/ H. Clay Barnett, III  
7 H. Clay Barnett, III (*pro hac vice*)  
8

9 **Signature of Certification**

10 Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories  
11 listed, and on whose behalf the filing is submitted, concur in the filing’s content and have  
12 authorized the filing.  
13

14 Dated: March 23, 2026

15 /s/ H. Clay Barnett, III  
16 H. Clay Barnett, III  
17 **BEASLEY, ALLEN, CROW,**  
18 **METHVIN, PORTIS & MILES, P.C**  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28