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13 Attorneys for Plaintiffs

14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 HEATHER TURREY, et al.,
17 Plaintiffs,
18 v.
19 VERVENT, INC., etc., et al.,
20 Defendants.

Case No. 3:20-cv-00697-DMS-AHG
CLASS ACTION

**JOINT NOTICE TO COURT OF
DEFENDANTS' NON-OPPOSITION TO
CERTAIN AMOUNT OF ATTORNEYS'
FEES AND NON-TAXED EXPENSES ON
APPEAL**

Date: October 16, 2026
Time: 1:30 p.m.

District Judge Dana M. Sabraw
Courtroom 13A, 13th Fl. (Carter-Keep)
Magistrate Judge Allison H. Goddard
Chambers Room 3B, (Schwartz)

Complaint Filed: April 10, 2020

BLOOD HURST & O' REARDON, LLP

Plaintiffs Heather Turrey, Oliver Fiaty, Jordan Hernandez, and Jeffrey Sazon (“Plaintiffs”) and Defendants Vervent, Inc., Activate Financial, LLC, and David Johnson (“Defendants”) (collectively, the “Parties”) provide this Joint Notice regarding Plaintiffs’ Motion for Attorneys’ Fees and Non-Taxed Expenses on Appeal (the “Appellate Fees and Expenses Motion”). Dkt. No. 405.

In accordance with Ninth Circuit rules, Plaintiffs-Appellees’ Appellate Fees and Expenses Motion was filed in the Ninth Circuit Court of Appeal on September 9, 2026. On September 10, 2026, the panel granted Plaintiffs-Appellees’ unopposed request to transfer that motion to this Court. App. Dkt. No. 64.

On September 14, 2026, Plaintiffs filed in this Court a Notice of Motion and Motion for Attorney Fees and Non-Taxed Expenses on Appeal. Dkt. No. 405. Defendants’ Opposition to the Appellate Fees and Expenses Motion is currently due on October 2, 2026.

In Plaintiffs’ Appellate Fees and Expenses Motion, Plaintiffs originally sought an order awarding attorneys’ fees of \$676,905 and non-taxed expenses of \$4,925.27. *See* Dkt. No. 405-1.

After Plaintiffs filed the Appellate Fees and Expenses Motion, the Parties met and conferred. As a result, Plaintiffs are no longer seeking attorneys’ fees of \$676,905 and non-taxed expenses of \$4,925.27, and Plaintiffs hereby reduce the amount they seek in fees, costs and expenses incurred on appeal to **\$535,000**.

Defendants hereby notify the Court that they do not oppose the Court entering an order granting Plaintiffs reasonable attorney’s fees, costs, and expenses incurred on appeal in the amount of **\$535,000**.

Respectfully submitted,

Dated: September 24, 2026

BLOOD HURST & O’REARDON, LLP
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Dated: September 24, 2026

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury that the foregoing is true and correct. Executed on September 24, 2026.

s/ Timothy G. Blood

TIMOTHY G. BLOOD

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