

02/22/2012 3:44 PM FAX 3103941430

THE COWAN LAW FIRM

0002/0005

1 JEFFREY W. COWAN, ESQ., SBN 157474
2 The Cowan Law Firm
3 1541 Ocean Avenue, Suite 200
4 Santa Monica, California 90401
5 Tel: (310) 394-1420
6 Fax: (310) 394-1430

7 Attorney for Plaintiff Sharon Song Byrd

FILED
LOS ANGELES SUPERIOR COURT

FEB 22 2012

JOHN A. CLARKE, CLERK
BY DARNETTA SMITH, DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

10 Sharon Song Byrd, an individual,
11 Plaintiff,

12 vs.

13 Tony Wafford, an individual, The Palms
14 Residential Care Facility, a California
15 Corporation, and Docs 1 through 100,
16 Defendants.

Case No. BC 403 677

(Action filed December 10, 2008;
assigned to Hon. Michael C. Solner)

Plaintiff Sharon Byrd's Notice of Entry
of Order Awarding Attorney's Fees and
Costs

Dept.: 39

The Cowan Law Firm
1541 Ocean Avenue, Suite 200
Santa Monica, California 90401
(310) 394-1420

17
18 TO PRO SE DEFENDANT TONY WAFFORD:

19 Please take notice that on February 17, 2012, the Court (Hon. Michael C. Solner
20 presiding) entered an order granting Plaintiff's motion for fees and costs.

21 A true copy of the Court's February 17, 2012 order is attached hereto.

22
23 THE COWAN LAW FIRM

24 DATED: February 22, 2012

25 By:


26 Jeffrey W. Cowan
27 Attorney for Plaintiff Sharon Song Byrd
28

1 122 Cal. App. 4th 1229, 1246-1247 (2004). As a result, the Court finds that Defendant Wafford
2 waived all objections to Plaintiff's motion.

3 After considering the moving papers and hearing argument from Plaintiff's counsel, the
4 Court grants the motion and rules as follows:

- 5
- 6 1. Plaintiff is awarded costs is the sum of \$16,370.21.
 - 7
 - 8 2. After deducting 50 hours of time (which the Court attributes to non-overlapping
9 issues regarding Defendant Palms Residential Care Facility, which settled earlier
10 in the lawsuit), the Court finds that Plaintiff's counsel Jeffrey W. Cowan
11 reasonably spent 536 hours (to date) prosecuting this lawsuit and that his stated
12 regular hourly rate (in 2011) of \$400 is reasonable for the Los Angeles legal
13 community/market. The Court therefore grants a fee award of \$214,520 based
14 on the foregoing figures (536 hours x \$400). The Court also finds that a
15 multiplier of 1.1 is appropriate to the foregoing \$214,520 lode star figure and on
16 that basis awards a total of \$235,972 in fees pursuant to the FEHA (including
17 Government Code § 12965(b)).
 - 18

19 The foregoing sums are due now, subject to immediate execution, and to the extent not
20 paid immediately are subject to interest at the legal rate. It is so ordered.

21
22 DATED: Feb 17, 2012

23 By: Michael C. Soler
24 Judge of the Superior Court

25 Respectfully submitted by

26 **JEFFREY W. COWAN, ESQ., SBN 157474**
27 The Cowan Law Firm
28 1541 Ocean Avenue, Suite 200
Santa Monica, California 90401
Tel: (310) 394-1420
Fax: (310) 394-1430

Attorney for **Plaintiff Sharon Song Byrd**

PROOF OF SERVICE

I am over the age of eighteen years and not a party to this action; my business address is 1541 Ocean Avenue, Suite 200, Santa Monica, California 90401.

On February 22, 2012 I served **Plaintiff Sharon Byrd's Notice of Entry of Order Awarding Attorney's Fees and Costs** on the interested parties in said action as indicated below:

Tony Wafford
254 North Hillcrest Boulevard
Inglewood, CA 90301

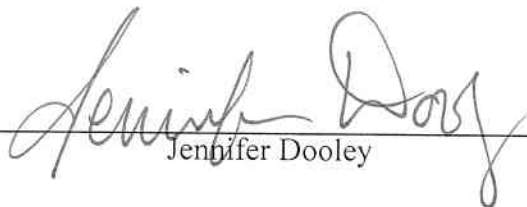
[BY MAIL] by placing a copy of said document for collection and mailing on the date indicated above, in a sealed envelope(s), addressed as set forth above, pursuant to ordinary business practices. I am "readily familiar" with this firm's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service at Santa Monica, California on that same day in the ordinary course of business.

[BY FACSIMILE] by transmitting a true copy by facsimile transmission at the time indicated on the transmission report from facsimile telephone number (310) 394-1430 to a facsimile machine maintained by the party on whom it was served, at the facsimile machine telephone number indicated on the attached service list. The transmission was reported as complete and without error. The transmission report which was properly issued by the transmitting facsimile machine is attached to the file copy of this document.

[BY OVERNIGHT COURIER] I caused to be delivered to and served by an *Overnight Courier* on all interested parties in said action, the above named document(s) by placing true copies thereof in enclosed sealed envelopes, delivery fees paid or provided for, and addressed as set forth above.

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

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 22, 2012 at Santa Monica, California.



Jennifer Dooley