

1 Andrew Wheeler-Berliner (SBN #290495)
2 Dargan M. Ware (SBN #329215)
3 DAVIS & NORRIS, LLP
4 2154 Highland Avenue S.
5 Birmingham, AL 35205
6 Telephone: 205.765.7324
7 Andrew@davisnorris.com
8 dware@davisnorris.com

9 Robert Salgado (SBN #297391)
10 DAVIS & NORRIS, LLP
11 5755 Oberlin Drive, Suite 301
12 San Diego, CA 92121
13 Telephone: 858.333.4103
14 Fax Number: 205.930.9989
15 Email: rsalgado@davisnorris.com

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

18 **KEN MORANDI and BLANCA**
19 **MERCADO, individually and on**
20 **behalf of all others similarly situated,**

21 **Plaintiff,**

22 v.

23 **SETERUS, INC.,**

24 **Defendant.**

25 **Case No. 2:19-cv-06334-MCS-**
26 **MAA**

27 **RENEWED NOTICE OF**
MOTION AND MOTION FOR
CLASS CERTIFICATION

Hon. Mark C. Scarsi

1 **CORRECTED NOTICE OF MOTION AND MOTION FOR CLASS**
2 **CERTIFICATION**

3 **I. INTRODUCTION**

4 PLEASE TAKE NOTICE that Plaintiffs Ken Morandi and Blanca Mercado will
5 submit and argue this motion for Class Certification on April 5, 2021, or at whatever
6 other time the Court may take up the motion.
7

8 **Hearing Date: April 5, 2021**
9 **Hearing Time: 9:00 a.m. Pacific Standard Time**
10 **Presiding Judge: Honorable Mark C. Scarsi**
11 **Courtroom: First street Courthouse, Courtroom 7C, 7th Floor**
12 **Address: 350 W. 1st St., Los Angeles, California 90012**

13 Plaintiffs hereby moves the court for an order certifying the following class:

14 All individuals in the state of California, who, during the applicable
15 limitations period, paid a convenience fee to Mr. Cooper for paying
16 over the phone in connection with any residential mortgage loan owned
17 or serviced by Mr. Cooper. All employees of the Court and Plaintiff's
18 counsel are excluded from this class.

19 Plaintiffs file this motion after meeting and conferring with Defendant's
20 counsel pursuant to the Local Rules, as detailed in the attached Rule 7-3 Compliance
21 Certification. The Motion for Class Certification will be based on this Notice, the
22 Memorandum of Points and Authorities filed herewith, the exhibits and evidence
23 filed herewith, and any other evidence submitted by the parties at or before the
24 hearing of this Motion, if any.

25 Respectfully submitted this 18th day of January, 2021,
26
27

/s/ Dargan M. Ware
One of the Attorneys for Plaintiffs

OF COUNSEL:

John E. Norris
Dargan M. Ware
Andrew Wheeler-Berliner
DAVIS & NORRIS, LLP
2154 Highland Ave. S.
Birmingham, AL 35205
Telephone: 205.930.9900
Facsimile: 205.930.9989
jnorris@davisnorris.com
dware@davisnorris.com
andrew@davisnorris.com

Robert B. Salgado
DAVIS & NORRIS, LLP
5755 Oberlin Dr. Suite 301
San Diego, CA 92121
Telephone: 858.333.4103
Facsimile: 205.930.9989
rsalgado@davisnorris.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served on all counsel of record on January 18, 2021 through the CM/ECF Electronic Filing System of the United States District Court for the Central District of California.

/s/ Dargan M. Ware
One of the Attorneys for Plaintiffs

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Class Action Complaint