

1 NICHOLAS J. FOX (SBN 279577)  
nfox@foley.com  
2 **FOLEY & LARDNER LLP**  
11988 El Camino Real, Suite 400  
3 San Diego, CA 92130  
Telephone: (858) 847-6700  
4 Facsimile: (858) 792-6773

EILEEN R. RIDLEY (SBN 151735)  
eridley@foley.com  
5 **FOLEY & LARDNER LLP**  
555 California Street, Suite 1700  
San Francisco, CA 94104-1520  
Telephone: (415) 434-4484  
6 Facsimile: (415) 434-4507

7 ROBERT L. TEEL (SBN 127081)  
lawoffice@rlteel.com  
8 **LAW OFFICE OF ROBERT L. TEEL**  
1425 Broadway, Mail Code: 20-6690  
Seattle, Washington 98122  
Telephone: (866) 833-5529  
9 Facsimile: (855) 609-6911

10 RONALD A. MARRON (SBN 175650)  
ron@consumersadvocates.com  
11 **LAW OFFICES OF**  
12 **RONALD A. MARRON, APLC**  
651 Arroyo Drive  
San Diego, California 92103  
Telephone: (619) 696-9006  
13 Facsimile: (619) 564-6665

14 *Attorneys for Plaintiffs and the Class*

15 UNITED STATES DISTRICT COURT  
16 SOUTHERN DISTRICT OF CALIFORNIA

17 JUAN ROMERO, FRANK  
18 TISCARENO, and KENNETH  
19 ELLIOTT on behalf of themselves and  
20 all others similarly situated,

21 Plaintiffs,

22 v.

23 SECURUS TECHNOLOGIES, INC.,  
24 Defendant.

Case No. 16-CV-1283-JM-MDD

**CLASS ACTION**

**NOTICE OF MOTION AND  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: June 5, 2020  
Time: 8:30 a.m.  
Ctrm.: 5D  
Judge: Hon. Jeffrey T. Miller

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**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on June 5, 2020 at 8:30 a.m., or as soon thereafter as this matter may be heard before the Honorable Jeffrey T. Miller, in Courtroom 5D of the Edward J. Schwartz United States Courthouse, located in Suite 5190, 221 West Broadway, San Diego, California 92101, Plaintiffs Kenneth Elliott, Juan Romero, and Frank Tiscareno (“Plaintiffs”) will, and hereby do, move this Court for an order: (1) certifying the Class for settlement purposes; (2) appointing Plaintiffs as Class representatives; (3) appointing Foley & Lardner LLP, the Law Offices of Ronald A. Marron, APLC, and the Law Office of Robert L. Teel as Class counsel; (4) granting preliminary approval of the proposed Settlement Agreement reached between Plaintiffs and Defendant Securus Technologies, Inc.; (5) ordering notice be given to the Class Members; and (6) scheduling a final approval hearing.

Plaintiffs’ counsel have conferred with counsel for Defendant who do not oppose this motion. The motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points and Authorities, Declaration of Robert Teel, and proposed Order filed herewith; (3) the Settlement Agreement; (4) the pleadings and papers on file in this action; and (5) such other written or oral argument as may be presented to the Court.

Dated: May 18, 2020

Respectfully submitted,

By: /s/ Robert L. Teel  
Robert L. Teel

LAW OFFICE OF ROBERT L. TEEL  
Robert L. Teel

FOLEY & LARDNER LLP  
Eileen R. Ridley  
Nicholas J. Fox

THE LAW OFFICE OF RONALD A. MARRON  
Ronald A. Marron  
*Attorneys for Plaintiffs Juan Romero,  
Frank Tiscareno, and Kenneth Elliot and the Class*