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20 *and the Proposed Class*

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*Liaison Counsel for Lead Plaintiff and
the Proposed Class*

21 **UNITED STATES DISTRICT COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 LEON D. MILBECK, on behalf of
24 himself and all others similarly situated

25 Plaintiff,

26 vs.

27 TRUECAR, INC., et al.,

28 Defendants.

) No. 2:18-cv-02612-SVW

) CLASS ACTION

) **LEAD PLAINTIFF'S NOTICE OF**
) **MOTION AND MOTION FOR**
) **CLASS CERTIFICATION**

) Date: May 13, 2019
) Time: 1:30 p.m.
) Courtroom: 10A
) Honorable Stephen V. Wilson

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT**, on May 13, 2019, at 1:30 p.m., or as soon
3 thereafter as can be heard, before the Honorable Steven V. Wilson, in
4 Courtroom 10A of the United States Courthouse for the Central District California,
5 located at 350 W. 1st Street, 10th Floor, Los Angeles, California 90012, Lead
6 Plaintiff Oklahoma Police Pension and Retirement Fund (“Plaintiff”) will and
7 hereby does move to certify this case as a Class Action (“Motion”). Additionally,
8 Plaintiff will request that the Court appoint it Class Representative, and appoint
9 Saxena White P.A. as Class Counsel, and Kaplan Fox & Kilsheimer LLP as Liaison
10 Counsel to the Class.

11 The Motion is based upon this Notice, the accompanying Memorandum of
12 Points and Authorities, the Declaration of Justin B. Farar and accompanying
13 exhibits, the pleadings and papers filed in this action, and upon such further
14 argument and matters that may be offered before or during the hearing of this
15 Motion.

16 This Motion is made following the conference of counsel pursuant to L.R. 7-
17 3, which took place on February 13, 2019.

18 Dated: March 8, 2019

Respectfully submitted,

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KAPLAN FOX & KILSHEIMER LLP

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By: /s/ Justin B. Farar

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Lead Counsel for Lead Plaintiff Oklahoma Police Pension and Retirement Fund, and the Proposed Class

1 **PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO**
2 **CENTRAL DISTRICT OF CALIFORNIA LOCAL RULES AND ECF**
3 **GENERAL ORDER NO. 10-07**

4 I HEREBY CERTIFY that, on March 8, 2019, I electronically filed the
5 foregoing with the Clerk of Court using the CM/ECF system, which will send a
6 notice of electronic filing to all registered users. I certify under penalty of perjury
7 under the laws of the United States of America that the foregoing is true and correct.

8 Executed on March 8, 2019.

9 /s/ Justin B. Farar
10 Justin B. Farar (SBN 211556)