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Attorneys for Plaintiff MICHAEL HILLSTROM

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF NAPA

MICHAEL HILLSTROM, an individual, on
behalf of himself and on behalf of all persons
similarly situated,

Plaintiff,

v.

CONSTELLATION BRANDS, INC., a
Delaware Corporation; TPWC, INC., a
Delaware Corporation; ROBERT
MONDAVI WINERY, a California
Corporation; CONSTELLATION BRANDS
U.S. OPERATIONS, INC., a New York
Corporation; FRANCISCAN VINEYARDS,
INC., a Delaware Corporation;
CONSTELLATION WINES U.S., INC., a
corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. 22CV000006

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT**

Date: April 19, 2024

Time: 9:30 a.m.

Judge: Hon. Cynthia P. Smith

Dept.: A

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on April 19, 2024, or as soon
3 thereafter as the matter can be heard, in Department A of the above-entitled Court, before the
4 Honorable Judge Cynthia P. Smith, Plaintiff MICHAEL HILLSTROM (“Plaintiff”) will apply for
5 an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of
6 the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated
8 November 30, 2023, and California Rules of Court, rule 3.769. This Motion will be based on this
9 notice, the accompanying points and authorities, the Class and Representative Action Settlement
10 Agreement (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, the Declaration of
11 Jean-Claude Lapuyade, the Declaration of Bryn Bridley, (the Settlement Administrator), the
12 Declaration of the Plaintiff, and the complete files and records in this action.

13 Because all parties have agreed to the proposed class settlement and have met and
14 conferred regarding the motion, Defendants do not oppose this motion. To date, there have been
15 no objections submitted by the Class.

16 Respectfully submitted,

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18 DATED: March 26, 2024

JCL LAW FIRM, APC

19 By: 

20 Monnett De La Torre, Esq.
21 Attorney for Plaintiff
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