

JCL LAW FIRM, APC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

EDUARDO YBARRA, an individual, on
behalf of himself and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

HELZBERG'S DIAMOND SHOPS, LLC, a
Missouri Limited Liability Company; and
DOES 1-50, Inclusive;

Defendants.

Case No. 21CV003531

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

Date: August 15, 2023

Time: 3:00 p.m.

Judge: Hon. Brad Seligman

Dept.: 23

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

2 YOU ARE HEREBY NOTIFIED THAT at 3:00 p.m. on August 15, 2023, or as soon
3 thereafter as the matter can be heard, in Department 23 of the above-entitled Court, before the
4 Honorable Judge Brad Seligman, Plaintiff EDUARDO YBARRA (“Plaintiff”) will apply for an
5 order will apply for an order granting (1) Final Approval of the Class Action and PAGA
6 Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated October
8 24, 2022, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class Action Claims and
10 Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, the
11 Declaration of Jean-Claude Lapuyade, the Declaration of Makenna Snow, (the Settlement
12 Administrator), the 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, this motion is not opposed by Defendant. To date, there have
15 been no objections submitted by the Class.

16 Respectfully submitted,

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18 Dated: July 21, 2023

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19 By: 
20 Jean-Claude Lapuyade, Esq.
21 Attorneys for Plaintiff

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