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Attorneys for Plaintiff OMAR VEJAR

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

OMAR VEJAR, on behalf of himself and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

FINELINE WOODWORKING, INC., a
California Corporation, FINELINE
ARCHITECTURAL MILLWORK, INC., a
California Corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 30-2021-01208607-CU-OE-CXC

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

Dept.: CX105
Judge: Randell J. Sherman

Date: April 15, 2022
Time: 10:00 A.M.
Reservation ID: 73712866

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on April 15, 2022 at 10:00 A.M. or as soon thereafter as
3 counsel may be heard, in the department CX105 of the above-captioned Court, Plaintiff OMAR
4 VEJAR will hereby move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Settlement of
6 Class Action Claims and Release of Claims (“Settlement Agreement”), attached as **Exhibit 1** to the
7 Declaration of Jean-Claude Lapuyade;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Class Action Settlement to the
10 Settlement Class Members;

11 4. Appoint Plaintiff OMAR VEJAR as the class representatives;

12 5. Appoint Jean-Claude Lapuyade, Esq. of the JCL LAW FIRM, APC, and Shani O.
13 Zakay, Esq. of the ZAKAY LAW GROUP, APLC, as class counsel; and

14 6. Set a hearing date for final approval of the settlement.

15 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
16 Points and Authorities in Support of Motion for Preliminary Approval of Class Action
17 Settlement; (3) the Declaration of Shani O. Zakay, Esq.; (4) the Settlement Agreement; (5) the
18 [Proposed] Order Granting Preliminary Approval of Class Action Settlement and exhibits
19 attached thereto; (6) the records, pleadings, and papers filed in this action; and (7) upon such
20 other documentary and oral evidence or argument as may be presented to the Court at or prior to
21 the hearing of this Motion.

22 As this Motion is unopposed, the Parties respectfully request relief from the page limit
23 requirement set by California Rules of Court, Rule 3.1113(d).

24
25 Dated: March 4, 2022

JCL LAW FIRM, APC

26 By: _____

Jean-Claude Lapuyade
Attorney for Plaintiff