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Attorneys for Plaintiff SERGIO ABUNDIS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

SERGIO ABUNDIS an individual, on behalf
of himself and on behalf of all persons
similarly situated,

Plaintiff,

vs.

IMAGE 2000, a California Corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 21STCV19193

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

Date: February 9, 2023
Time: 10:00 a.m.

Judge: Hon. Yvette Palazuelos
Dept.: 9

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on February 9, 2023, or as soon
3 thereafter as the matter can be heard, in Department 9 of the above-entitled Court, before the
4 Honorable Judge Yvette Palazuelos, Plaintiff SERGIO ABUNDIS (“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.

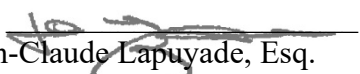
7 This Motion is brought in accordance with the Preliminary Approval Order dated August
8 17, 2022, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Second Amended Stipulation of Settlement of Class
10 Action Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O.
11 Zakay, the Declaration of Jean-Claude Lapuyade, the Declaration of Madely Nava (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: January 17, 2023

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