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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SAN DIEGO**

VY TRINH, an individual, on behalf of himself  
and on behalf of all persons similarly situated,

Plaintiff,

v.

PRECISION METAL PRODUCTS, INC., a  
Delaware Corporation; HBD INDUSTRIES,  
INC., a Delaware Corporation; and DOES 1-50,  
Inclusive,

Defendants.

Case No. 37-2022-00000965-CU-OE-CTL

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

Date: October 16, 2023  
Time: 9:00 a.m.

Judge: Hon. Matthew C. Braner  
Department: C-60

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

2           YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on October 16, 2023, or as soon  
3 thereafter as the matter can be heard, in Department C-60 of the above-entitled Court, before the  
4 Honorable Judge Matthew C. Braner, Plaintiff VY TRINH (“Plaintiff”) will apply for an order  
5 granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final  
6 Approval Order and Judgment.

7           This Motion is brought in accordance with the Preliminary Approval Order dated June 9,  
8 2023, 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 and PAGA Action  
10 Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay,  
11 the Declaration of Jean-Claude Lapuyade, the Declaration of the Plaintiff, and the complete files  
12 and records in this action.

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

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17           Respectfully submitted,

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20           Dated: September 20, 2023

**ZAKAY LAW GROUP, APLC**

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22           By:   
23           Julieann Alvarado, Esq.

24           Attorney for Plaintiff  
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