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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

LATISHA SHACONNA ANDERSON,
SARAH BAXLEY, JASON ANDERSON,
and MELODY JAMES, individually, on
behalf of all persons similarly situated,

Plaintiffs,

vs.

BARTON MYERS ASSOCIATES, INC., a
California Corporation; BARTON
ASSOCIATES, INC. a California
Corporation; BARTON & ASSOCIATES,
INC., which will do business in California as
BARTON MEDICAL, INC., a Delaware
Corporation; and DOES 1 through 50
Inclusive,

Defendants.

Case No. 21STCV43314

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

Date: June 2, 2023
Time: 9:00 AM

Judge: Hon. Elihu M. Berle
Dept.: 6

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on June 2, 2023, or as soon
3 thereafter as the matter can be heard, in Department 6 of the above-entitled Court, before the
4 Honorable Judge Elihu M. Berle, Plaintiffs LATISHA SHACONNA ANDERSON, SARAH
5 BAXLEY, JASON ANDERSON, and MELODY JAMES (“Plaintiffs”) will apply for an order
6 will apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and
7 (2) Entry of the Final Approval Order and Judgment.

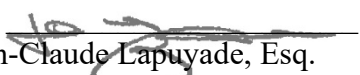
8 This Motion is brought in accordance with the Preliminary Approval Order dated February
9 2, 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Class Action and PAGA Settlement Agreement
11 (hereinafter collectively the “Agreement”), the Declaration of Shani O. Zakay, Esq., the
12 Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Cassandra Polites (the Settlement
13 Administrator), the Declaration of the Plaintiffs, and the complete files and records in this action.

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

17 Respectfully submitted,

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19 Dated: April 3, 2023

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