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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

BRITTANI POWELL, MELANIE
MCCONNAUGHY, and ROSCOE SIMPSON
individuals, on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

CORE COMMUNITY ORGANIZED RELIEF
EFFORT, a California Nonprofit Corporation
and DOES 1 through 50, Inclusive,

Defendants.

Case No. CGC-21-596527

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

Date: September 4, 2023

Time: 9:30 a.m.

Judge: Hon. Samuel K. Feng

Dept.: 302

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

2 PLEASE TAKE NOTICE that on **September 4, 2023, at 9:30 a.m.**, or as soon thereafter as
3 counsel may be heard, in Department 302 of the San Francisco Superior Court, the Honorable Judge
4 Samuel K. Feng presiding, plaintiff Brittani Powell, Melanie McConnaughy, and Roscoe Simpson will,
5 and hereby does, move this Court to:

6 1. Preliminarily approve the settlement described in the Class Action and PAGA
7 Settlement Agreement (“Agreement”) attached as Exhibit 1 to the Declaration of Jean-Claude
8 Lapuyade filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Class Action Settlement to the
11 Settlement Class attached as Exhibit A to the Agreement;

12 4. Appoint Plaintiff Brittani Powell, Melanie McConnaughy, and Roscoe Simpson as the
13 Class Representatives;

14 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Haig B. Kazandjian
15 Lawyers, APC as Class Counsel; and

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

17 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
18 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
19 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
20 Declaration of Haig B. Kazandjian, Esq.; (6) the Declaration of Brittani Powell, (7) the Declaration of
21 Melanie McConnaughy; (8) the Declaration of Roscoe Simpson; (9) the Class Action and PAGA
22 Settlement Agreement and exhibit attached thereto; (10) the [Proposed] Order Granting Preliminary
23 Approval of Class Action and PAGA Settlement and exhibits attached thereto; (11) the records,
24 pleadings, and papers filed in this action; and (12) upon such other documentary and oral evidence or
25 argument as may be presented to the Court at or prior to the hearing of this Motion.

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

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4 Dated: July 28, 2023

JCL LAW FIRM, APC

5 By: 
6 Jean-Claude Lapuyade
7 Attorneys for Plaintiff
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