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Attorneys for Plaintiff GABRIELLE BOYD

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

GABRIELLE BOYD, an individual, on behalf
of herself, and on behalf of all persons similarly
situated,

Plaintiffs,

vs.

BLUESTONE LANE HOLDINGS, LLC, a
Delaware limited liability company;
BLUESTONE LANE NY LLC, a New York
limited liability company; and DOES 1 through
50, Inclusive;

Defendants.

Case No. CGC-20-585787

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

Hearing Date: April 26, 2022

Hearing Time: 9:30am

Department: 302

Trial Date: Not Set

Action Filed: July 28, 2020

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on April 26, 2022, or as soon
3 thereafter as the matter can be heard, in Department 302 of the above-entitled Court, Plaintiff
4 Gabrielle Boyd (“Plaintiff”) will apply for an order (1) preliminarily approving the proposed
5 settlement of this class action with Defendants Bluestone Lane Holdings, LLC, and Bluestone Lane
6 NY, LLC (“Defendants”); (2) approving the form and method for providing class-wide notice; (3)
7 directing that notice of the proposed settlement be given to the class; and (4) scheduling a final
8 approval hearing date to consider Plaintiff’s motion for final approval of the settlement and entry
9 of the Judgment, and Plaintiff’s motion for approval of attorneys’ fees and litigation expenses.

10 This motion for preliminary approval of the class settlement is brought pursuant to
11 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of motion and
12 motion, the accompanying points and authorities, the Declaration of Jean-Claude Lapuyade, the
13 Declaration of Shani O. Zakay, the Class Action Settlement Agreement (“Agreement”) between the
14 parties, and the complete files and records in this action. All parties have agreed to the proposed
15 class settlement and have met and conferred regarding the motion; therefore, this motion is not
16 opposed by Defendants. As this Motion is unopposed, the Parties respectfully request relief from
17 the page limit requirement set by California Rules of Court, Rule 3.1113(d).

18 Respectfully submitted,

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20 DATED: March 30, 2022

ZAKAY LAW GROUP, APLC

21 By: 
22 Shani O. Zakay
23 Attorney for Plaintiff
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