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Attorneys for Plaintiff NICOLAS NEUTALL

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

NICOLAS NEUTALL, an individual, on behalf
of himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

URBAN ALCHEMY, a California
Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. CGC-20-588622

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

Hearing Date: March 7, 2023

Hearing Time: 9:30 a.m.

Department: 302

Trial Date: Not Set

Action Filed: December 23, 2020

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on March 7, 2023, or as soon
3 thereafter as the matter can be heard, in Department 302 of the above-entitled Court, Plaintiff
4 Nicolas Neutall (“Plaintiff”) will apply for an order (1) preliminarily approving the proposed
5 settlement of this class action with Defendant Urban Alchemy (“Defendant”); (2) approving the
6 form and method for providing class-wide notice; (3) directing that notice of the proposed
7 settlement be given to the class; and (4) scheduling a final approval hearing date to consider
8 Plaintiff’s motion for final approval of the settlement and entry of the Judgment, and Plaintiff’s
9 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: February 8, 2023

ZAKAY LAW GROUP, APLC

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