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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN BERNARDINO**

CHRISTOPHER CHACON, an individual, on
behalf of himself and on behalf of all persons
similarly situated and the State of California,

Plaintiff,

v.

PANDA MOTORS, INC. a California
Corporation; EDGAR CASTELLANOS, an
individual; and DOES 2-50, Inclusive,

Defendants.

Case No. CIVDS2022220

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

Date: October 5, 2023
Time: 1:30 p.m.

Judge: Hon. Joseph Ortiz
Dept.: S-17

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

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on October 5, 2023, or as soon
3 thereafter as the matter can be heard, in Department S17 of the above-entitled Court, before the
4 Honorable Judge Joseph Ortiz, plaintiffs CHRISTOPHER CHACON, VYNZ PUNONGBAYAN,
5 NICHOLAS CORDERO, and LUIS VEGA ("Plaintiffs") will apply for an order will apply for an
6 order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the
7 Final Approval Order and Judgment.

8 This Motion is brought in accordance with the Preliminary Approval Order dated May 4,
9 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 Settlement Agreement and Release of
11 Claims (hereinafter the "Agreement"), the Declaration of Shani O. Zakay, the Declaration of
12 Nicholas J. De Blouw, the Declaration of Orion Robinson, the Declarations of the Plaintiffs, the
13 Declaration of Cassandra Polites, (the Settlement Administrator), and the complete files and
14 records in this action.

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

18 Respectfully submitted,

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20 Dated: September 11, 2023

ZAKAY LAW GROUP, APLC

21 By: 
22 Shani O. Zakay, Esq.
23 Attorneys for Plaintiff
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