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Attorneys for Plaintiff MONSERRAT LOPEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF VENTURA

MONSERRAT LOPEZ, an individual, on
behalf of herself, on behalf of all persons
similarly situated, and in her representative
capacity on behalf of the State of California
and fellow Aggrieved Employees,

Plaintiffs,

vs.

ADIDAS AMERICA, INC., an Oregon
corporation; and DOES 1 through 50,
Inclusive;

Defendants.

Case No. 56-2021-00549844-CU-OE-VTA

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

Date: April 4, 2022

Time: 8:20 a.m.

Judge: Hon. Mark Borrell

Dept.: 40

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:20 pm on April 4, 2022, or as soon
3 thereafter as the matter can be heard, in Department 40 of the above-entitled Court, before the
4 Honorable Judge Mark Borrell, Plaintiff MONSERRAT LOPEZ (“Plaintiffs”) will apply for an
5 order will apply for an order granting (1) Final Approval of the Class Action Settlement, and (2)
6 Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated
8 December 1, 2021, and California Rules of Court, rule 3.769. This Motion will be based on this
9 notice, the accompanying points and authorities, the Class Action Settlement Agreement
10 (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, the Declaration of Jean-Claude
11 Lapuyade, the Declaration of Madely Nava, (the Settlement Administrator), the Declaration of the
12 Plaintiff, and the complete files and records in this action.

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

16 Respectfully submitted,

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18 DATED: March 10, 2022

ZAKAY LAW GROUP, APLC

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20 By:  _____

21 Shani O. Zakay
22 Attorney for Plaintiff
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