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Counsel for Plaintiff Luben Romanov, on behalf of
himself and all others similarly situated

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LUBEN ROMANOV, on behalf of
himself and all others similarly
situated,

Plaintiff,

v.

AMAZON.COM SERVICES, LLC
a Delaware limited liability
company; and DOES 1 through 20,
inclusive,

Defendants.

Case No. 2:20-cv-02692 SB (KSx)

CLASS ACTION

**NOTICE OF MOTION AND MOTION
FOR ORDER GRANTING
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION,
APPROVAL OF CLASS NOTICE AND
SETTING OF FINAL APPROVAL
HEARING DATE**

Date: October 1, 2021

Time: 8:30 a.m.

Ctrm: 6C

1 PLEASE TAKE NOTICE that on October 1, 2021 at 8:30 a.m., in Courtroom
2 6 C (6th Floor) of the above-captioned Court located at 350 West First Street, Los
3 Angeles, California 90012, Plaintiff Luben Romanov, on behalf of himself and all
4 others similarly situated will, and does, move this Court to:

5 1. Preliminarily approve the Settlement described in the Class and
6 Representative Action Settlement Agreement (“Settlement Agreement”), attached as
7 Exhibit 1 to the Declaration of Michael D. Singer filed herewith;

8 2. Approve the content of the proposed Notice of Class Action Settlement
9 and its distribution to all members of the Class;

10 3. Appoint Plaintiff Luben Romanov as the Class Representative;

11 4. Appoint The Phelps Law Group, The Carter Law Firm, and Cohelan
12 Khoury & Singer as Class counsel;

13 5. Appoint Simpluris, Inc. as the Administrator of the Settlement; and

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

15 This motion is made following the conference of counsel pursuant to L.R. 7-
16 3. The Parties have jointly drafted the motion and settlement materials and
17 Defendant does not intend to oppose the motion.

18 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the
19 supporting Memorandum of Points and Authorities; (3) the Declarations of Michael
20 D. Singer, Marc H. Phelps, Roger R. Carter, and Plaintiff Luben Romanov filed
21 herewith; (4) the records, pleadings, and papers filed in this action; and (5) upon
22 such other documentary and oral evidence or argument as may be presented to the
23 Court at or prior to the hearing of this Motion.

24 Dated: August 9, 2021

COHELAN KHOURY & SINGER
THE CARTER LAW FIRM
THE PHELPS LAW GROUP

25
26 By: s/ J. Jason Hill
J. Jason Hill

27 Attorneys for Luben Romanov, on behalf
28 of himself, and all others similarly situated