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Attorneys for Plaintiff ROSE SMITH

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

ROSE SMITH, Individually and on behalf
of all other current and former all
similarly-situated and aggrieved
employees of Defendants in the State of
California,

Plaintiffs,

v.

TRADITION ONE and DOES 1 through
50, inclusive,

Defendants.

Case No.: 37-2020-00024461-CU-OE-CTL

Unlimited Civil - Amount Demanded
Exceeds \$25,000.00

CLASS ACTION [CCP § 382]

IMAGED FILE

**PLAINTIFF ROSE SMITH'S NOTICE OF
UNOPPOSED MOTION AND MOTION
FOR AN ORDER 1) PROVISIONALLY
CERTIFYING SETTLEMENT CLASS; 2)
PRELIMINARILY APPROVING CLASS
SETTLEMENT; 3) DIRECTING
DISTRIBUTION OF NOTICE OF
SETTLEMENT TO THE CLASS; 4)
APPOINTING CLASS COUNSEL AND
CLASS REPRESENTATIVE; AND 5)
SETTING A HEARING FOR FINAL
APPROVAL OF CLASS SETTLEMENT**

Date: February 10, 2022

Time: 9:00 a.m.

Judge: Hon. James A. Mangione

Dept.: C-75

Date Complaint Filed: July 15, 2020

1 **TO ALL PARTIES, THEIR ATTORNEYS OF RECORD AND THIS HONORABLE**
2 **COURT:**

3 **PLEASE TAKE NOTICE THAT** on February 10, 2022, at 9 a.m.. in Department C-75 of the
4 San Diego Superior Court located at 330 W. Broadway, CA 92101, Plaintiff Rose Smith (“Plaintiff”)
5 hereby moves this Court, pursuant to California Code of Civil Procedures section 382, for entry of the
6 proposed Order submitted herewith: (1) provisionally certifying the settlement class; (2) preliminarily
7 approving the class action settlement; (3) directing distribution of notice of settlement to the class; (4)
8 appointing ShortLegal, APC as class counsel and the named Plaintiff, Rose Smith as class representatives;
9 and (5) setting a final approval hearing.

10 This Motion is supported by the following documents filed concurrently herewith: Memorandum
11 of Points and Authorities in Support of Motion for Order (1) provisionally certifying the settlement class;
12 (2) preliminarily approving the class action settlement; (3) directing distribution of notice of settlement to
13 the class; (4) appointing ShortLegal, APC as class counsel and the named Plaintiff as class representatives;
14 and (5) setting a final approval hearing.

15 This motion is based on this Notice, Plaintiff’s accompanying Memorandum of Points and
16 Authorities, the accompanying declaration of Brian R. Short, Esq. and exhibits hereto including the Class
17 Action Settlement and Compromise Agreement and the Class Notice, and the pleadings, records and files
18 in this action and such argument and evidence which may be presented at or before the hearing.

19
20 Dated: January 17, 2022

ShortLegal, APC



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23 By:

BRIAN R. SHORT, ESQ.
DOROTA JAMES, ESQ.