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Attorneys for Plaintiff VERNELL BATTLE, JR., on behalf of himself and others

**SUPERIOR COURT OF CALIFORNIA**

**FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

VERNELL BATTLE, JR., on behalf of himself  
and other similarly-situated employees,

Plaintiff,

vs.

SAFRAN CABIN, INC., a Delaware  
Corporation; and DOES 1 through 25, inclusive,

Defendants.

CASE NO. 30-2020-01140831-CU-OE-CXC  
ASSIGNED FOR ALL PURPOSES TO:  
The Honorable Peter J. Wilson  
Department CX 102

**CLASS ACTION**

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

**Hearing Information**

Date: September 22, 2022

Time: 2:00 p.m.

Dept: CX 102

Judge: Hon. Peter J. Wilson

Complaint filed: May 26, 2020

Trial date: Not set

COHELAN KHOURY & SINGER  
605 C Street, Suite 200  
San Diego, CA 92101

PLEASE TAKE NOTICE on September 22, 2022 at 2:00 p.m. or as soon as the matter may be heard in Department CX-102 of the above-captioned Court located at 751 West Santa Ana Blvd., Santa Ana, California 92701, Honorable Peter J. Wilson presiding, Plaintiff Vernell Battle, Jr., on behalf of himself and the putative class, will move this Court for an Order:

1. Preliminarily approving the Class Action Settlement as fair, adequate, and reasonable based on terms set forth in the Joint Stipulation of Class Action and PAGA Settlement and Release, (“Agreement”), including payment by Defendant Safran Cabin, Inc. of the Gross Settlement Amount of \$5,455,000.00

2. Conditionally certifying the case as a class action for settlement purposes only;

3. Approving Notice of Class Action Settlement be mailed via first class U.S. Mail to all members of the Settlement Class advising them of the: pendency of Class Action; proposed Settlement; manner and procedure for submitting requests for exclusion and objections to the Settlement; automatic payment of their share of the Settlement funds without the need to return a claim form; date set for the final approval hearing; and, of the right to appear at the Final Approval hearing;

4. Appointing Cohelan Khoury & Singer and Davtyan Law Firm, Inc. as Class Counsel;

5. Appointing Plaintiff Vernell Battle, Jr. as Class Representative;

6. Appointing Simpluris, Inc. as the Settlement Administrator;

7. Setting a hearing date to consider final approval of the Settlement.

This motion is based on this Notice, Points and Authorities, Declarations of Class Counsel Isam C. Khoury and Emil Davtyan, Named Plaintiff Vernell Battle, Jr, and Eric Springer for Administrator Simpluris, the Agreement, [Proposed] Order Granting Preliminary Approval, the Court’s files, and such other evidence the Court may consider.

Respectfully submitted,

COHELAN KHOURY & SINGER  
DAVTYAN LAW FIRM, INC.

Dated: August 11, 2022

By:   
Isam C. Khoury, Esq.  
Attorneys for Plaintiff Vernell Battle, Jr., on behalf of  
himself and all others similarly situated