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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **COUNTY OF SAN DIEGO**

17 ANA SANTANA, individually and on behalf of
18 all similarly situated current and former and/or
19 aggrieved employees of DEFENDANTS in the
State of California,

20 Plaintiff,

21 v.

22 HARBOR FOODS, INC., HARBOR FOODS
23 #2, INC., HARBOR FOODS #3, INC,
24 HARBOR FOODS #4, INC. and DOES 1
THROUGH 50, inclusive,

25 Defendants.

Case No.: 37-2020-00026743-CU-OE-CTL

**PLAINTIFFS' NOTICE OF UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND PAGA ACTION
SETTLEMENT**

[IMAGED FILE]

Date: April 21, 2023
Time: 9:00 a.m.
Judge: Hon. James A. Mangione
Dept: C-75

Complaint Filed: July 30, 2020
Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on April 21, 2023 at 9:00 a.m. or as soon thereafter as the matter
3 can be heard in Department 75 of the above-entitled courthouse, located at 330 West Broadway, CA
4 92101, Plaintiffs Ana Santana and Maria Gomez, on behalf of themselves and the putative class, will and
5 hereby does move the Court for an order: (1) Preliminarily Approving Settlement of Plaintiffs' Class and
6 PAGA Action Claims as stated in the Joint Stipulation for Class Action and Representative Action
7 Settlement and Release; (2) Conditionally certifying the class for settlement purposes; (3) Approving and
8 directing distribution of the Notice of Class Action Settlement; (4) Appointing the Class Representatives
9 and Class Counsel; and (5) Scheduling a Final Approval Hearing.

10 This Motion is supported by the following documents: (1) Plaintiffs' Memorandum of Points and
11 Authorities in Support of Plaintiff's Motion for Preliminary Approval of Class and PAGA Action
12 Settlement; (2) Declaration of Graham S.P. Hollis in Support of Plaintiff's Motion for Preliminary
13 Approval of Class and PAGA Action Settlement, and the Exhibits attached thereto; (3) Declaration of
14 Daniel F. Gaines in Support of Plaintiffs' Motion for Preliminary Approval of Class and PAGA Action
15 Settlement, and the Exhibits attached thereto; (4) Declaration of Ana Santana in Support of Plaintiffs'
16 Motion for Preliminary Approval of Class and PAGA Action Settlement; (5) Declaration of Maria Gomez
17 in Support of Plaintiffs' Motion for Preliminary Approval of Class and PAGA Action Settlement; (6)
18 [Proposed] Order Granting Preliminary Approval; (7) Declaration of Settlement Administrator; and (8)
19 all records and pleadings filed in this actions and such argument and evidence which may be presented at
20 or before the hearing.

21
22 Dated: March 29, 2023

GRAHAMHOLLIS APC

23
24 By:



25 GRAHAM S.P. HOLLIS
26 VILMARIE CORDERO
27 ERIK DOS SANTOS
28 Attorneys for Plaintiffs