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SUPERIOR COURT OF CALIFORNIA, CITY AND COUNTY OF SAN FRANCISCO

HOLLY LA LUZ, an individual and on behalf
of all others similarly situated;

Plaintiff,

vs.

VOXELMAPS, INC., a Delaware corporation;
TECH MAHINDRA (AMERICAS), INC.;
PETER ATALLA, an individual; and DOES
1-50, inclusive,

Defendants.

Case No.: CGC-20-584129

**NOTICE OF MOTION FOR
CONDITIONAL CERTIFICATION OF
SETTLEMENT CLASS AND
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: March 18, 2021

Time: 9:30 a.m.

Dept: 302

Hon. Judge: Judge Ethan P. Schulman

Complaint Filed: April 2, 2020

First Amend. Complaint Filed: July 29, 2020

PLEASE TAKE NOTICE that on March 18, 2021 at 9:30 a.m., in Department 302 of the Superior Court of California for the City and County of San Francisco, located at 400 McAllister Street, San Francisco, California, Plaintiff Holly La Luz will seek an order from the Court granting conditional certification of the settlement class and preliminary approval of a class action settlement in this matter.

Request for Relief

By this motion, Plaintiff respectfully moves the Court for an order:

1. Granting conditional certification of the Settlement Class pursuant to California Code of Civil Procedure § 382;
2. Approving Plaintiff Holly La Luz as representative of the Settlement Class;

3. Approving Patrick R. Kitchin, Esq., Kitchin Legal, APC, as counsel to the Settlement Class;
4. Granting preliminary approval of the class wide settlement reached by the parties;
5. Approving the form and content of the proposed form of notice;
6. Approving CPT Group, Inc., as the settlement administrator, and preliminarily approving the estimated cost to administer the settlement in the not-to-exceed amount of \$5,500.00 (Five Thousand, Five Hundred Dollars);
7. Establishing a schedule for the dissemination of notice of the proposed settlement to Settlement Class Members, as well as deadlines for Class Members to opt out and/or object to the settlement;
8. Scheduling a hearing on final approval of the settlement at which Class Members may be heard;
9. Dismissing without prejudice Defendant Tech Mahindra (Americas), Inc.; and
10. Dismissing without prejudice Defendant Peter Atalla.

A copy of the [Proposed] Order Granting Preliminary Approval is attached to the Settlement Agreement as Exhibit C and submitted separately herewith.

This motion is based under California Rules of Court Rules 3.769, and is based on this Notice, the Memorandum of Points and Authorities, the Declarations of Patrick R. Kitchin, Holly La Luz and Julie Green, and exhibits thereto, the complete file of pleadings in this matter, and on such other evidence and argument that may be presented at the hearing of this motion.

Date: February 17, 2021

KITCHIN LEGAL, APC

By /s/ Patrick R. Kitchin

Patrick R. Kitchin

Attorney for Plaintiff Holly La Luz