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Attorneys for Plaintiff Julio Ochoa, individually and
on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

JULIO OCHOA, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SPEECH AND LANGUAGE
DEVELOPMENT CENTER, INC.; and
DOES 1 through 25, inclusive

Defendants.

Case No. 30-2020-01143577-CU-OE-CXC
ASSIGNED FOR ALL PURPOSES TO:

The Honorable James J. Di Cesare
Department C16

CLASS ACTION

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

Date: June 10, 2022

Time: 9:30 a.m.

Dept: C16

Judge: Honorable James J. Di Cesare

Reservation: 73725796

Complaint filed: June 18, 2020

Trial date: Not set

PLEASE TAKE NOTICE on June 10, 2022 at 9:30 a.m. or as soon as the matter may be heard in Department C16 of the above-captioned Court located at 700 W. Civic Center Drive, Santa Ana, California 92702, Honorable James J. Di Cesare presiding, Plaintiff Julio Ochoa 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 Settlement Agreement and Release of Class and Representative Action, ("Settlement Agreement"), including payment by Defendant Speech and Language Development Center, Inc. of the Gross Settlement Amount of \$750,000;

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

3. Approving Notice of Class Action Settlement be mailed with a Change of Address Form, and pre-printed return envelope via first class U.S. Mail to all Settlement Class members 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 Lebe Law, APLC, as Class Counsel;

5. Appointing Plaintiff Julio Ochoa as Class Representative;

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

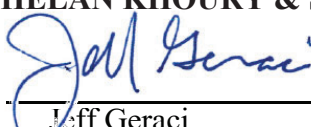
7. Setting a hearing date to consider final approval of the Settlement.

This motion is based on this Notice, Points and Authorities, Declarations of Class Counsel Jeff Geraci and Jonathan M. Lebe, Named Plaintiff Julio Ochoa, and Eric Springer for Administrator Simpluris, the Settlement Agreement, [Proposed] Order Granting Preliminary Approval, the Court's files, and such other evidence the Court may consider.

Respectfully submitted,

LEBE LAW, APLC
COHELAN KHOURY & SINGER

Dated: March 24, 2022

By: 

Jeff Geraci
Attorneys for Plaintiff Julio Ochoa, individually and
on behalf of all others similarly situated