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Attorneys for Plaintiff Don M. Vasquez, individually and
on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF TULARE

DON M. VASQUEZ, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SAPUTO CHEESE USA INC., a Delaware
corporation; and DOES 1 through 25,
inclusive

Defendants.

Case No. VCU282978

Consolidated with Case No. VCU283853

ASSIGNED FOR ALL PURPOSES TO:

The Honorable John P. Bianco

Department 2

CLASS ACTION

**NOTICE OF MOTION AND UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT**

Hearing: December 4, 2023

Time: 8:30 a.m.

Dept: 2

Judge: Hon. John P. Bianco

Complaint filed: May 27, 2020

Trial date: Not set

PLEASE TAKE NOTICE on December 4, 2023 at 8:30 a.m., or as soon as the matter may be heard in Department 2 of the above-captioned court located at 221 South Mooney Boulevard, Visalia, California, 93291, Don M. Vasquez ("Plaintiff"), on behalf of himself and the Putative Class, will move this Court for an Order:

1. Preliminarily approving the Class Action and Private Attorneys General Act (PAGA) Settlement as fair, adequate, and reasonable based on the Stipulation of Class and PAGA Settlement ("Agreement") between Plaintiff and Defendant Saputo Cheese USA, Inc. ("Saputo"), and payment by Saputo of the \$2,400,000 Gross Settlement Amount;

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

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

4. Appointing Jonathan M. Lebe and Zachary Gershman of Lebe Law, APLC and Michael D. Singer and Jeff Geraci of Cohelan Khoury & Singer as Class Counsel;

5. Appointing Plaintiff Don. M. Vazquez as Class Representative;

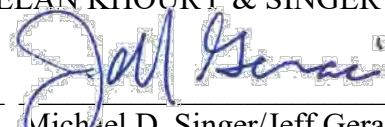
6. Appointing CPT Group, Inc. to administer the Settlement;

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

This motion is based on this Notice of Motion, Points and Authorities, Declarations of Class Counsel Jeff Geraci and Jonathan M. Lebe, Declaration of Plaintiff Don. M. Vazquez, Declaration of Julie Green on behalf of CPT Group, Inc., the Agreement, Notice of Proposed Class Action Settlement, [Proposed] Order Granting Preliminary Approval of Class Action Settlement, and the Court's files in this matter.

LEBE LAW, APLC
COHELAN KHOURY & SINGER

Dated: November 8, 2023

By: 
Michael D. Singer/Jeff Geraci
Attorney for Plaintiff Don M. Vasquez

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