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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LUIS DE JESUS, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

vs.

GUARDIAN ANGEL HOME CARE, INC., a
Michigan Corporation; SAM D. KASSAB; an
individual, and DOES 2-50, Inclusive;

Defendants.

Case No. 37-2020-00021049-CU-OE-CTL

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT**

Date: June 24, 2022

Time: 8:30 a.m.

Judge: Hon. Ronald F. Frazier

Dept.: 65

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on June 24, 2022, or as soon
3 thereafter as the matter can be heard, in Department 65 of the above-entitled Court, before the
4 Honorable Judge Ronald F. Frazier, Plaintiff LUIS DE JESUS (“Plaintiff”) will apply for an order
5 will apply for an order granting (1) Final Approval of the Class Action Settlement, and (2) Entry
6 of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated
8 December 22, 2021, and California Rules of Court, rule 3.769. This Motion will be based on this
9 notice, the accompanying points and authorities, the Stipulation of Settlement of Class and PAGA
10 Action Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O.
11 Zakay, the Declaration of Jean-Claude Lapuyade, the Declaration of Lluvia Islas, (the Settlement
12 Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

13 Because all parties have agreed to the proposed class settlement and have met and
14 conferred regarding the motion, this motion is not opposed by Defendant. To date, there have
15 been no objections submitted by the Class.

16 Respectfully submitted,

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18 DATED: June 1, 2022

JCL LAW FIRM, APC

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20 By:  _____

21 Jean-Claude Lapuyade
22 Attorney for Plaintiff
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