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Attorneys for Plaintiff and others similarly situated

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CINNAMON MILLS, individually, on
a representative basis, and on behalf of
all others similarly situated;

Plaintiff,

vs.

TARGET CORPORATION, a
Minnesota Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: 5:20-CV-01460-JGB-KK
[Assigned to Hon. Jesus G. Bernal]

FRCP RULE 23 CLASS ACTION

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing

Date: November 13, 2023
Time: 9:00 a.m.
Courtroom: 1

Complaint filed: June 10, 2020

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on November 13, 2023, at 9:00 a.m., or as soon
3 thereafter as the matter can be heard in Courtroom 1 of the above-entitled Court, located
4 at 3470 Twelfth Street, Riverside, California 92501, Plaintiff Cinnamon Mills will move
5 this Court, pursuant to FRCP Rule 23, for an order: (1) granting preliminary approval of
6 the proposed settlement in this certified class action wage & hour case; (2) authorizing
7 the parties to mail the proposed Class Notice Packet to the Class Members; and (3)
8 setting a final approval or fairness hearing to be heard approximately 130 days after the
9 date preliminary approval is granted, as the Court's calendar permits. A proposed order
10 to this effect is filed concurrently herewith.

11 This motion is unopposed by Defendant Target Corporation. The parties seek the
12 Court's preliminary approval of the settlement in order to begin the process towards
13 obtaining final approval of the proposed settlement.

14 This Motion is based upon this Notice, the Memorandum of Points and
15 Authorities, the Class Action and PAGA Settlement Agreement, the declarations of
16 Plaintiff's Counsel (Brian Mankin, Peter Carlson and Deepak Gupta) filed herewith, and
17 the proposed Order submitted herewith, the pleadings and records on file with this Court
18 and on such oral and documentary evidence as may be presented at the time of hearing.

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20 Dated: October 13, 2023

LAUBY, MANKIN & LAUBY LLP

21 BY: /s/ Brian J. Mankin
22 Brian J. Mankin, Esq.
23 Attorneys for Plaintiff and the similarly
24 situated employees
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