

Patrick R. Kitchin, Esq. (State Bar No. 162965)
KITCHIN LEGAL, APC
1999 Harrison Street, 18th Floor, #3535
Oakland, CA 94612
Telephone: (415) 677-9058
Email: prk@kitchinlegal.com

Nicholas C. Rowley, Esq. (State Bar No. 220036)
Kelly B. Hanker, Esq. (State Bar No. 257596)
TRIAL LAWYERS FOR JUSTICE
877 S. Victoria Ave., Suite 201
Ventura, CA 93003
Tel: 310-855-3727
Fax: 310-855-3595
Email: KELLY@TL4J.COM, TEAMOJAI@TL4J.COM

Attorneys for Ildiko O'Connor, Laura Raya and Dina Shashua

SUPERIOR COURT OF CALIFORNIA FOR THE COUNTY OF VENTURA

ILDIKO O'CONNOR, an individual and on
behalf of all others similarly situated;
LAURA RAYA, an individual and on
behalf of all others similarly situated; and
DINA SHASHUA, an individual and on
behalf of all others similarly situated;

Plaintiff,

vs.

FERGUSON SM, INC., a California
Corporation; SEAN CORREA, an individual
THOMAS HUMPHREY, an individual,
MICHAEL REYES, an individual, INFINITI
HR WEST, LLC, an Arizona Limited
Liability Company, HR SERVICE GROUP,
LLC, a Maryland Limited Liability
Company, and DOES 3-50, inclusive,
,

Defendants.

Case No.: 56-2020-00543357-CU-OE-VTA

**PLAINTIFFS' NOTICE OF AND MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: May 16, 2024
Hearing Time: 8:30 a.m.
Department 40
Judge: Hon. Judge Mark S. Borrell

Complaint Filed: July 17, 2020
SAC Filed: Nov. 24, 2020
Trial Date: None set

PLEASE TAKE NOTICE that Plaintiffs Ildiko O'Connor, Laura Raya and Dina Shashua
will, and hereby do, move for an order from the Court granting final approval of the class action

1 settlement and entering judgment thereon. This matter will come on for hearing on May 16, 2024,
2 at 8:30 a.m., in Department 40 of the Superior Court of California for the County of Ventura, located
3 at 800 South Victoria Avenue, Ventura, California 93009.

4 This motion is based under California Rules of Court Rules 3.760, et seq. and is based on
5 this Notice, the Plaintiffs' Memorandum of Points and Authorities, the Declaration of Patrick R.
6 Kitchen, and exhibits thereto, the Declaration of Phoenix Class Action Administration Solutions,
7 the complete file of pleadings in this matter, and on such other evidence and argument that may be
8 presented at the hearing of this motion.

9 **Request For Relief**

10 Plaintiffs respectively request that the Court:

- 11 1. Grant final approval of the settlement reached by the parties; and
- 12 2. Grant approval to Phoenix Class Action Administration Solutions to distribute the
13 settlement proceeds in accordance with the parties' preliminarily-approved settlement.

14 Dated: April 17, 2024

KITCHIN LEGAL, APC

16 By: Patrick R. Kitchen
17 Patrick Kitchen, Esq.
18 Attorneys for Plaintiffs Ildiko O'Connor, Laura
19 Raya and Dina Shashua
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