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Attorneys for Plaintiff ALEXANDER CASTELLANOS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

ALEXANDER CASTELLANOS, an
individual, on behalf of himself, and on behalf
of all persons similarly situated,

Plaintiff,

vs.

SOUTHWEST SECURITY PATROL, INC.,
d.b.a. SOUTHWEST PATROL, a California
corporation; and DOES 1 through 50, Inclusive;

Defendants.

Case No. 37-2020-00024905

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

Date: April 8, 2022

Time: 8:30 a.m.

Judge: Hon. Keri Katz

Dept.: 74

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on April 8, 2022 at 8:30 a.m. or as soon thereafter as counsel
3 may be heard, in Department 74 of the San Diego Superior Court, 330 West Broadway, San Diego,
4 CA 92101, the Honorable Judge Keri Katz presiding, plaintiff ALEXANDER CASTELLANOS,
5 (hereinafter "Plaintiff"), will move this Court for an Order Granting Final Approval of Class Action
6 Settlement and Judgment.

7 This **unopposed** Motion seeks final approval of the Stipulation of Settlement of Class Action
8 Claims and Release of Claims.

9 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
10 Points and Authorities in Support of Motion for Final Approval of Class Action Settlement; (3) the
11 Declaration of Jean-Claude Lapuyade, Esq., in Support of Motion for Final Approval of Class Action
12 Settlement; (4) the Declaration of Shani O. Zakay, Esq. in Support of Motion for Final Approval of
13 Class Action Settlement; (5) the Declaration of Alexander Castellanos in Support of Motion for Final
14 Approval of Class Action Settlement; (6) the Declaration of Lluvia Islas in Support in Motion for Final
15 Approval of Class Action Settlement; (7) the [Proposed] Order Granting Final Approval of Class
16 Action Settlement; (8) the [Proposed] Judgment; (9) the Motion for Class Counsel Award and Class
17 Representative Service Award filed concurrently herewith; (10) the Declaration of Jean-Claude
18 Lapuyade, Esq., in Support of the Motion for Class Counsel Award and Class Representative Service
19 Awards; (11) the Declaration of Shani O. Zakay, Esq., in Support of the Motion for Class Counsel
20 Award and Class Representative Service Awards; (12) the Declarations of Adam Rose, Esq., in Support
21 of the Motion for Final Approval; (13) the Declaration of Douglas Alonzo Allen Gray in Support of
22 the Motion for Final Approval; (14) the Declaration of Robert Mauna in Support of the Motion for
23 Final Approval; (15) all the papers and pleadings previously filed in support of Plaintiffs' Motion for
24 Preliminary Class Action Settlement Approval; and (16) upon such other documentary and/or oral
25 evidence as may be presented to the Court at the hearing.

26 Plaintiff and Class Counsel's Motion for Class Counsel Award and Class Representative Service
27 Award, together with the Declaration of Class Counsel Jean-Claude Lapuyade, Esq. are filed
28 concurrently herewith.

1 As this Motion is unopposed, the Parties respectfully request relief from the page limit
2 requirement set by California Rules of Court, Rule 3.1113(d).

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4 Dated: March 16, 2022

JCL LAW FIRM, APC

5 By: 
6 Jean-Claude Lapuyade
7 Attorneys for Plaintiff
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