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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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 29, 2021

Time: 8:30 a.m.

Judge: Hon. Keri Katz

Dept.: 74

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

PLEASE TAKE NOTICE that on October 29, 2021, at 8:30 a.m., or as soon thereafter as
counsel may be heard, in Department 74 of the San Diego Superior Court, located at 330 W Broadway
Street, San Diego, CA 92101, the Honorable Judge Keri Katz presiding, plaintiff ALEXANDER
CASTELLANOS, ROBERT MAUNA and DOUGLAS ALONZO ALLEN GRAY will, and hereby

does, move this Court to:

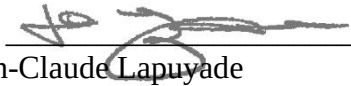
1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the Declaration of Jean-Claude Lapuyade filed concurrently herewith;
2. Conditionally certify the Settlement Class;
3. Approve distribution of the proposed Notice of Class Action Settlement to the Settlement Class;
4. Appoint Plaintiff ALEXANDER CASTELLANOS, ROBERT MAUNA and DOUGLAS ALONZO ALLEN GRAY as the Class Representative;
5. Appoint the JCL Law Firm, APC, Zakay Law Group, APC, Frontier Law Center and Donabedian Law, APC as Class Counsel; and
7. Set a hearing date for final approval of the settlement.

This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Stipulation of Settlement of Class Action Claims and Release of Claims and exhibit attached thereto; (5) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement and exhibits attached thereto; (6) the records, pleadings, and papers filed in this action; and (7) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

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

Dated: October 1, 2021

JCL LAW FIRM, APC

By: 
 Jean-Claude Lapuyade
 Attorneys for Plaintiff