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Attorneys for Plaintiff and the putative classes

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

TANEA MALDONADO, on behalf of
herself and all others similarly situated,
Plaintiffs,

vs.

FIRST MAINSAIL, INC. dba
PRIMAVERA RISTORANTE, a
California Corporation; JEANNETTE
STAVROS; and DOES 1 through 10,
inclusive,

Defendants.

CASE NO. 37-2020-00023369-CU-OE-CTL

CLASS ACTION

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

[Assigned for All Purposes to the Hon. Ronald
Frazier]

Date: July 1, 2022
Time: 8:30 a.m.
Dept: C-65
Judge: Ronald Frazier
Action Filed: July 7, 2020

TO: ALL PARTIES HEREIN AND THEIR COUNSEL OF RECORD

Please take notice that on July 1, 2022 at 8:30 a.m., or as soon thereafter as may be heard, in
Department C-65 in the above titled case, Plaintiff Tanea Maldonado will move this Court for an
order:

1. Granting final approval of the settlement under the terms set forth in the Stipulation
of Settlement and Release (“Settlement” or “Settlement Agreement”);

2. Granting final approval of the amount of \$1,250 allocated for penalties under the California Private Attorneys General Act, Cal. Labor Code § 2698 *et. seq.* (“PAGA”);

3. Granting final approval of the amount of \$5,000 as a Service Award to Representative Plaintiff Tanea Maldonado;

4. Granting final approval of Plaintiff’s Counsel’s attorney fees in the amount of \$23,331.00, which is 1/3 of the Gross Settlement Fund of \$70,000;

5. Granting final approval of the reimbursement of Plaintiff’s Counsel’s costs in the amount of \$1,917.07; and

6. Entering a Final Judgment consistent with the terms of the Settlement Agreement. Good cause exists for the granting of this Motion in that the proposed settlement is fair, reasonable and adequate.

This Unopposed Motion is based on this Motion, the attached Memorandum of Points and Authorities, the Declaration of Thomas A. Rist, the Declaration of Plaintiff Tanea Maldonado, the Declaration of claims administrator Nicole Bench, any other papers, files and documents filed with this Court, and upon such further oral and/or documentary evidence as may be presented to the Court at the time of the hearing of this matter.

DATED: June 6, 2022

RIST LAW OFFICE, LC
NAKASE LAW FIRM



By: _____

Thomas A. Rist
Brad Nakase
Attorneys for Plaintiffs