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Attorneys for Plaintiff and the putative classes

**SUPERIOR COURT OF 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 PLAINTIFF'S
MOTION FOR UNOPPOSED
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND
PROVISIONAL CLASS CERTIFICATION**

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

Date: December 10, 2021

Time: 8:30 a.m.

Dept: C-65

Judge: Ronald Frazier

Action Filed: July 7, 2020

1 **NOTICE OF MOTION**

2 **TO: ALL PARTIES HEREIN AND TO THEIR COUNSEL OF RECORD:**

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4 PLEASE TAKE NOTICE that on December 10, 2021 at 8:30 a.m. or as soon thereafter as the
5 matter can be heard in Department C-65 in the above entitled courthouse located at 330 W. Broadway,
6 San Diego, CA 92101, Plaintiff Tanea Maldonado will move this Court for an order: (1) Provisionally
7 certifying the Class for settlement purposes only; (2) Preliminarily approving the class action settlement
8 embodied in the Stipulation of Settlement and Release; (3) Approving the Notice of Proposed Class
9 Action Settlement and Final Approval Hearing and Class Member Information Sheet (collectively,
10 "Notice Packet") and the plan for distribution of the Notice Packet to Class Members; (4) Appointing
11 ILYM Group, as the Settlement Administrator; (6) provisionally approving Tanea Maldonado as Class
12 Representative; (6) Provisionally approving Thomas A. Rist of Rist Law Office, LC and Brad Nakase of
13 Nakase Law Firm, Inc. as counsel for Plaintiff and Class Members in this matter; and (7) Scheduling a
14 Final Approval Hearing for a date convenient to the Court. Defendants do not oppose this Motion.

15 This Motion is based upon this notice, the accompanying Memorandum of Points & Authorities
16 filed herewith, the accompanying Declaration of Thomas A. Rist, the Stipulation of Settlement and
17 Release and all exhibits, the filings on record in this case, and upon such further evidence, both
18 documentary and oral, that may be presented at the hearing of this motion.

19 DATED: November 8, 2021

RIST LAW OFFICE, LC

NAKASE LAW FIRM, INC.

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22 By:  _____

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24 Thomas A. Rist

25 Brad Nakase

26 Attorneys for Plaintiff
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