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**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE - CIVIL COMPLEX CENTER**

KATHERYN ENRIQUEZ, as individuals and
on behalf of other similarly situated
employees,

Plaintiff,

vs.

VINTAGE REAL ESTATE GROUP, INC., a
California corporation, and DOES 1-50,
inclusive,

Defendants

CASE NO: 30-2020-01157744-CU-OE-
CXC

Assigned for all purposes to:
Judge Peter Wilson
Dept. CX102

**NOTICE OF MOTION AND MOTION
FOR ORDER PRELIMINARILY
APPROVING CLASS ACTION
SETTLEMENT**

Hearing Date: November 17, 2022
Hearing Time: 2:00 p.m.
Department: CX104

Case filed: August 28, 2020
Trial date: February 27, 2023

**NOTICE OF MOTION AND MOTION FOR ORDER PRELIMINARILY APPROVING
CLASS ACTION SETTLEMENT**

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on November 17, 2022, at 2:00 p.m., in Department CX
3 102 of the Superior Court of California for the County of Orange, in the Civil Complex Center,
4 located at 751 West Santa Ana Boulevard, Santa Ana, CA 92701, Plaintiff will, and hereby does,
5 move for an order to:

- 6 1. Preliminarily approve the settlement described in the Settlement Agreement;
7 2. Conditionally certify the Settlement Class;
8 3. Approve distribution of the proposed Notice of Class Action Settlement and Exclusion
9 Form;
10 4. Appoint Plaintiff Katheryn Enriquez as Class Representatives;
11 5. Appoint Jackson Law APC as Class Counsel;
12 6. Appoint ILYM, Inc. as Claims Administrator;
13 7. Set a hearing date for final approval of the Settlement;
14 8. Approve the PAGA allocation.

15 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum
16 of Points and Authorities in Support of the Motion for Preliminary Approval of Class Action
17 Settlement; (3) the declaration of Armond M. Jackson; (4) the declaration of Katheryn Enriquez;
18 (5) the Declaration of Andrea M. Fernandez-Jackson (6) Settlement Agreement; (7) the Notice of
19 Class Action Settlement; (8) the Exclusion Form; (9) the [Proposed] Order Granting Preliminary
20 Approval of Class Action Settlement; (10) the records, pleadings, and papers filed in this action;
21 and (11) upon such other documentary and oral evidence or argument as may be presented to the
22 Court at or prior to the hearing of this Motion.

23 Dated: October 19, 2022

24 **JACKSON APC**
25 **A PROFESSIONAL CORPORATION**

26 By:/s/ Armond M. Jackson
27 Armond M. Jackson
28 Attorney for Plaintiff Katheryn Enriquez