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

JOAQUIN SANTIBANEZ, and JORGE
MAZARIEGOS, as individuals and on behalf
of other similarly situated employees,

Plaintiff,

vs.

DANCHUK MANUFACTURING, INC., a
California corporation, and DOES 1-50,
inclusive,

Defendants.

Case No.: 30-2020-01155466-CU-OE-CXC

Assigned for all purposes to:
Hon. Randall J. Sherman
Dept. CX 105

**NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: October 22, 2021
Hearing Time: 10:00 a.m.
Department: CX 105

Case filed: August 17, 2020
Trial date: TBD

Res. ID: 73608406

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

2 **PLEASE TAKE NOTICE THAT** on October 22, 2021 at 9:00 a.m., or as soon
3 thereafter as the matter may be heard at the above titled court, located at 751 W. Santa Ana
4 Boulevard, Santa Ana, California 92701, in Dept. CX105 the Honorable Randall J. Sherman
5 presiding, Plaintiffs Joaquin Santibanez and Jorge Mazariegos will and hereby does move the
6 Court to:

- 7 1. Preliminarily approve the settlement described in the Settlement Agreement;
8 2. Conditionally certify the Settlement Class;
9 3. Approve distribution of the proposed Notice of Class Action Settlement and Exclusion
10 Form;
11 4. Appoint Plaintiffs Joaquin Santibanez and Jorge Mazariegos as Class Representatives;
12 5. Appoint Jackson Law APC as Class Counsel;
13 6. Appoint Phoenix Claims Administration as Claims Administrator;
14 7. Set a hearing date for final approval of the Settlement.

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 Joaquin Santibanez;
18 (5) declaration of Jorge Mazariegos; (6) Settlement Agreement; (7) the Notice of Class Action
19 Settlement; (8) the Exclusion Form; (9) the [Proposed] Order Granting Preliminary Approval of
20 Class Action Settlement; (10) the records, pleadings, and papers filed in this action; and (11)
21 upon such other documentary and oral evidence or argument as may be presented to the Court at
22 or prior to the hearing of this Motion.
23

24 Dated: September 15, 2021

25 **JACKSON LAW, APC**
26 By:/s/ Armond M. Jackson
27 Armond M. Jackson
28 Attorney for Plaintiffs Joaquin Santibanez
and Jorge Mazariegos