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Attorneys for Plaintiff DANIEL JACOBS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

DANIEL JACOBS, on behalf of himself, and
others similarly situated,

Plaintiff,

v.

RUSH MEDIA COMPANY, LLC, a
Wisconsin limited liability company; XLT
MANAGEMENT SERVICES, INC. an Illinois
corporation; and DOES 1-50, inclusive,

Defendants.

Case No: 20STCV32350

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

Hearing Date: November 12, 2021
Hearing Time: 10:30 AM

Honorable Judge Daniel J. Buckley
Department 1

Trial Date: Not Set
Action Filed: August 25, 2020

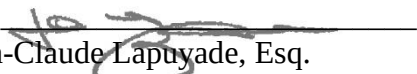
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on November 12, 2021 or as soon
3 thereafter as the matter can be heard, in Department 1 of the above entitled Court, before the Honorable
4 Judge Daniel J. Buckley, Plaintiff DANIEL JACOBS (“Plaintiff”) will apply for an order (1) preliminary
5 approving the proposed settlement of this class action with Defendants RUSH MEDIA COMPANY,
6 LLC and XLT MANAGEMENT SERVICES, INC. (“Defendants”); (2) approving the form and method
7 for providing class-wide notice; (3) directing that notice of the proposed settlement be given to the class;
8 and (4) scheduling a final approval hearing date to consider Plaintiff’s motion for final approval of the
9 settlement and entry of the Judgment, and Plaintiff’s motion for approval of attorneys’ fees and litigation
10 expenses.

11 This motion for preliminary approval of the class settlement is brought pursuant to California
12 Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of motion and motion, the
13 accompanying points and authorities, the Declarations of Shani O. Zakay, Jean-Claude Lapuyade, the
14 Stipulation of Class Action Claims and Release of Claims between the parties, and the complete files
15 and records in this action. All parties have agreed to the proposed class settlement and have met and
16 conferred regarding the motion; therefore, this motion is not opposed by Defendant. As this Motion is
17 unopposed, the Parties respectfully request relief from the page limit requirement set by California Rules
18 of Court, Rule 3.1113(d).

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20 Dated: October 18, 2021

Respectfully submitted,
JCL LAW FIRM, APC

21 By: 
22 Jean-Claude Lapuyade, Esq.
23 Attorneys for Plaintiff
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