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Attorneys for Plaintiff

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
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS SETTLEMENT**

Hearing Date: May 2, 2022

Hearing Time: 10:30AM

Honorable Judge Daniel J. Buckley
Department 1

Trial Date: Not Set

Action Filed: August 25, 2020

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:30 am on May 2, 2022, or as soon thereafter as the matter can be heard, in Department 1 of the above-entitled Court, before the Honorable Judge Daniel J. Buckley, Plaintiff Daniel Jacobs (“Plaintiff”) will apply for an order will apply for an order granting (1) Final Approval of the Class Action Settlement, and (2) Entry of the Final Approval Order and Judgment.

This Motion is brought in accordance with the Preliminary Approval Order dated December 20, 2021, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, the Class Action Settlement Agreement (hereinafter the “Agreement”), the Declarations of Shani O. Zakay and Jean-Claude Lapuyade, the Declaration of Lluvia Islas, (the Settlement Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

Because all parties have agreed to the proposed class settlement and have met and conferred regarding the motion, this motion is not opposed by Defendants. To date, there have been no objections submitted by the Class.

Respectfully submitted,

DATED: April 7, 2022

ZAKAY LAW GROUP, APLC

By: 
Shani O. Zakay
Attorney for Plaintiff