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Attorneys for Plaintiff SCOTT CAHN,
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

SCOTT CAHN, individually and on behalf
of himself and all others similarly situated,

Plaintiff,

v.

J.J.R. ENTERPRISES, INC., doing
business as CALTRONICS BUSINESS
SYSTEMS, a California Corporation; and
DOES 1-50, inclusive,

Defendants.

Case No. 34-2020-00284704

Assigned for All Purposes to:
Hon. Lauri A. Damrell
Dept.: 28

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL
STIPULATION OF SETTLEMENT**

Date: January 26, 2024
Time: 9:00 a.m.
Dept.: 28

1 **TO DEFENDANT J.J.R. ENTERPRISES, INC. DBA CALTRONICS BUSINESS**
2 **SYSTEMS, AND TO ITS ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE THAT** on January 26, 2024 at 9:00 a.m., or as soon thereafter
4 as the matter may be heard, in Department 28 of the above-captioned court, located at the Gordon
5 D. Schaber Sacramento County Courthouse, 4th floor, 720 9th St, Sacramento, CA 95814, before
6 the Honorable Lauri A. Damrell, Plaintiff Scott Cahn (“Plaintiff”), individually, and on behalf of
7 the members of the conditionally certified class and group of aggrieved employees he seeks to
8 represent, will and hereby do move this Court to (1) grant final approval of the Stipulation of
9 Settlement reached between Plaintiff and Defendant J.J.R. Enterprises, Inc. dba Caltronics
10 Business Systems (“Defendant”) (collectively “the Parties”), the terms of which are set forth in
11 the Stipulation of Settlement (“Settlement”) attached as **Exhibit 1** to the supporting Declaration
12 of James R. Hawkins (“Hawkins Decl.”); (2) certify the Settlement Class for Settlement Purposes;
13 (3) grant the requested settlement administration expenses to Phoenix Settlement Administrators,
14 which administered the settlement; and (4) enter final judgement substantially in the form of the
15 proposed order submitted herewith. Plaintiff concurrently brings a motion for approval of the
16 Class Representative Enhancement Payment and Attorneys’ Fees and Costs.

17 The Settlement has been successfully administered, and good cause exists for granting the
18 Motion and finding the Settlement and settlement administration expenses to be fair, reasonable,
19 and appropriate.

20 This motion is brought pursuant to California Rule of Court 3.769 and California Code of
21 Civil Procedure section 382, and is based on this Notice of Motion and Motion; the Memorandum
22 of Points and Authorities in support of this Motion; the Declaration of James R. Hawkins in
23 Support of Final Approval; the Declaration of Scott Cahn in Support of Final Approval; the
24 Declaration of Jarrod Salinas on behalf of Phoenix Settlement Administrators, the Proposed Order
25 Granting Final Approval of Stipulation of Settlement and Judgement; the Declaration of James R.
26 Hawkins in Support of Preliminary Approval; all documents currently on file in this action
27 including without limitation those submitted in support of preliminary approval; the arguments of
28 counsel; and such other and further evidence as the Court may choose to entertain.

1 This motion is set to be heard concurrently with Plaintiff's Motion for Attorney's Fees
2 and Costs, and Class Representative Enhancement Payment.

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4 Dated: January 03, 2024

Respectfully Submitted:

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6 **JAMES HAWKINS, APLC**

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8 By: _____


James R. Hawkins
Christina M. Lucio

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10 Attorneys for Plaintiff Scott Cahn
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