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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

EMILY FERRER, ELIJAH WESTCOTT,
MANUEAL BANUELOS MACIAS and on
behalf of themselves and other aggrieved
employees,

Plaintiffs,

v.

FITNESS INTERNATIONAL, LLC, a
California Limited Liability Company;
and DOES 1 through 100, inclusive,

Defendants.

CASE NO. 37-2020-00044088-CU-OE-CTL
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Joel R. Wohlfeil
Department C-73

REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT ("PAGA") SETTLEMENT**

Date: July 21, 2023
Time: 9:00 a.m.
Dept: C-73
Judge: Honorable Joel R. Wohlfeil
Reservation: 2974855

Complaint filed: December 2, 2020
Trial date: Not set

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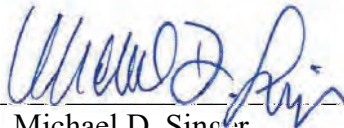
PLEASE TAKE NOTICE that on July 21, 2023 at 9:00 a.m. or as soon as the matter may be heard in Department C-73 before the Honorable Joel R. Wohlfeil of the Superior Court for the State of California, County of San Diego, Hall of Justice located at 330 West Broadway, San Diego, California 92101, Plaintiffs Emily Ferrer, Elijah Westcott, and Manuel Banuelos Macias ("Plaintiffs") will move this Court for an Order Granting Approval of a Private Attorneys General Act Settlement ("PAGA"), pursuant to California Labor Code section 2698, et seq. The Motion will be made on the grounds that the proposed PAGA Settlement is fair, reasonable and in the best interest of Plaintiffs and all other PAGA Members.

The motion will be based on this Notice of Motion, the Memorandum of Points and Authorities, Declarations of PAGA Counsel Michael D. Singer, Haig B. Kazandjian, and Raul Perez, Declarations of Plaintiffs Emily Ferrer, Elijah Westcott, Manuel Banuelos Macias, Declaration of Julie Green on behalf of CPT Group, Inc., the Private Attorneys General Act Settlement and Release, (Exhibit "1" to the Singer Declaration), all other papers and records on file in this action, and on such oral and documentary evidence as may be presented at the hearing on this Motion.

Respectfully submitted,

COHELAN KHOURY & SINGER
HAIG B. KAZANDJIAN LAWYERS, APC
CAPSTONE LAW APC

Dated: May 16, 2023

By: 
Michael D. Singer
Counsel for Plaintiffs EMILY FERRER, ELIJAH
WESTCOTT, MANUEAL BANUELOS MACIAS