

MESSRELIAN LAW, INC.

HAROUT MESSRELIAN (SBN: 272020)

500 N. Central Ave., Suite 840

Glendale, CA 91203

Telephone: (818) 484-6531

Facsimile: (818) 956-1983

Email: hm@messrelianlaw.com

Attorneys for Plaintiff CARINA CAMBEROS, and all others similarly situated
(Additional Counsel on Following Page)

GREENBERG TRAUIG, LLP

Mark D. Kemple (SBN 145219)

Ashley Farrell Pickett (SBN 271825)

1840 Century Park East, Suite 1900

Los Angeles, CA 90067

Tel: (310) 586-7700; Fax: (310) 586-7800

Email: kemplem@gtlaw.com

farrellpickett@gtlaw.com

Attorneys for Defendant

GREAT AMERICAN CHICKEN CORP, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

(UNLIMITED JURISDICTION)

CARINA CAMBEROS, on behalf of herself
and others similarly situated,

Plaintiff(s),

vs.

GREAT AMERICAN CHICKEN CORP,
INC.; and DOES 1 thru 50, inclusive,

Defendant(s).

Case No.: 21STCV32015

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

Action filed: August 30, 2021

Hearing Date: April 12, 2022

Hearing Time: 9:00 a.m.

Hearing Dept: SSC-6, Hon. Elihu M. Berle

Submitted Herewith Under Separate Cover

1. Memorandum of Points and Authorities;
2. Declaration of Harout Messrelian;
3. Declaration of Haig B. Kazandjian; and
4. [Proposed] Order.

ADDITIONAL ATTORNEY FOR PLAINTIFF

HAIG B. KAZANDJIAN LAWYERS APC

Haig B. Kazandjian (SBN: 278622)

801 N. Brand Blvd., Suite 970

Glendale, CA 91203

Tel: (818) 696-2306

Email: haig@hbklawyers.com

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on April 12, 2022, at 9:00 a.m. or as soon thereafter as
3 counsel may be heard, in Department SSC-6 of the above-entitled court, located at 312 N. Spring
4 St., Los Angeles, California 90012, Plaintiff Carina Camberos (“Plaintiff”) and Defendant Great
5 American Chicken Corp., Inc. (“Defendant” or “GACC”) will jointly move for an order (1)
6 granting class certification of the Class solely for settlement purposes pursuant to Code of Civil
7 Procedure § 382; (2) preliminarily approving the Settlement Agreement and Release of Claims
8 (the “Settlement”)¹, (3) appointing Harout Messrelian of Messrelian Law Inc. and Haig B.
9 Kazandjian of Haig B. Kazandjian Lawyers APC as Class Counsel; (4) appointing Plaintiff as
10 Class Representative; (5) approving the use of the proposed notice procedures and related forms;
11 (6) directing that notice be mailed to the proposed Settlement Class; and (7) scheduling a hearing
12 date for motion for final approval of class action settlement and awards of attorneys’ fees and
13 costs.

14 The “Settlement Class Members” (collectively referred to as the “Settlement Class”) is
15 defined as any and all non-exempt California employees of Defendant who worked between
16 January 1, 2020 and the Preliminary Approval Date.

17 This motion is made on the following grounds: (1) the Class meets all the requirements
18 for class certification for settlement purposes only under Code of Civil Procedure § 382; (2)
19 Plaintiff and her counsel are adequate to represent the Class; (3) the Settlement reflects a fair,
20 adequate, and reasonable compromise of all disputed claims in view of Defendant’s potential
21 liability exposure as compared against the risks of continued litigation; (4) the proposed notice
22 procedures and related forms adequately apprise the Settlement Class Members of their rights
23 under the Settlement and fully comport with due process; and (5) in view of the foregoing, notice
24 should be disseminated to Settlement Class Members and a hearing date for motion for final
25 approval of class action settlement, and awards of attorneys’ fees and costs should be set.

26 The motion is based on this Notice of Motion, the attached Memorandum of Points and
27

28 ¹ The Settlement is attached as Exhibit 1 to the Declaration of Harout Messrelian (“HM”), which
is submitted herewith under a separate cover.

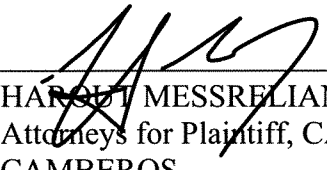
1 Authorities, the Declarations of Harout Messrelian and Haig B. Kazandjian, all papers and
2 pleadings on file with the Court in this action, all matters judicially noticeable, and on such oral
3 and documentary evidence as may be presented in connection with the hearing on the Motion.

4 Respectfully submitted,

5 MESSRELIAN LAW INC.

6
7 Dated: March 9, 2022

By:


8 HAROUT MESSRELIAN
9 Attorneys for Plaintiff, CARINA
CAMBEROS

10
11 GREENBERG TRAURIG, LLP

12
13 Date: March 9, 2022

By:


14 MARK D. KEMPLE
15 ASHLEY FARRELL PICKETT
16 Attorneys for Defendant GREAT
17 AMERICAN CHICKEN CORP, INC.
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