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Attorneys for Plaintiff Luis Lopez,
individually and on behalf of all others similarly-situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

LUIS LOPEZ, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

GE UNITED TECHNOLOGIES, LLC, a
Delaware Limited Liability Company d/b/a
GRASSDOOR, and DOES 1 through 10,
Inclusive,

Defendants.

Case No. 20STCV34691

ASSIGNED FOR ALL PURPOSES TO:
The Honorable William F. Highberger
Department SS10

CLASS ACTION

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND ENTERING
JUDGMENT**

Date: October 24, 2022

Time: 11:30 a.m.

Dept.: 10

Judge: William F. Highberger

Complaint filed: September 11, 2020

Trial date: Not set

PLEASE TAKE NOTICE, on October 24, 2022 at 11:30 a.m., or as soon as the matter may be heard in Department SS10 of the above-captioned court located at 312 North Spring Street, Los Angeles, California 90012, Honorable William F. Highberger presiding, Plaintiff Luis Lopez, on behalf of himself and the putative class, will move this Court for an Order Granting Final Approval of Class Action Settlement and Entering Judgment as set forth in the fully-executed Joint Stipulation of Settlement and Release of Class Action filed on March 25, 2022 ("Settlement Agreement"). Plaintiff move this Court to:

1. Finally adjudicate the Settlement is fair, reasonable, and adequate;
2. Direct distribution of Individual Settlement Payments by the Settlement Administrator to all Participating Class Members and PAGA Members in accordance with the Settlement Agreement;
3. Approve and direct payment to Class Counsel for their attorneys' fees in the sum of \$116,833.33 and reimbursement of their litigation costs of \$14,483.55.
4. Approve and direct the Class Representative Service Payment of \$5,000.00 to Plaintiff Luis Lopez;
5. Approve and direct the payment to Simpluris, Inc., the appointed Settlement Administrator, of \$13,000.00 for its fees and costs in administering the Settlement;
6. Approve the PAGA Payment to California's Labor and Workforce Development Agency of \$3,7500.00 (75% of \$5,000.00); and,
7. Direct the Clerk of the Court to enter final judgment, and without affecting the finality of the final judgment, to reserve the Court's continuing jurisdiction over the Parties for the purposes of implementing, enforcing, or administering the terms of the Agreement.

This motion is made on the grounds that the proposed Settlement, preliminarily approved by this Court on May 24, 2022, is the product of arms'-length, good-faith negotiations, is fair and reasonable to the Class, and should now be finally approved, as more fully discussed in the accompanying Memorandum in Support of Final Approval of Class Action Settlement and Entering Final Judgment.

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1 This motion is based on this Notice of Motion, the Memorandum of Points and
2 Authorities in Support, Declarations of Class Counsel Diana M. Khoury and Rodney Mesriani,
3 the Declaration of Plaintiff Luis Lopez, Declaration of Evelin Reyes on behalf of Simpluris,
4 Inc., the Settlement Agreement and Amendment to Settlement Agreement, the Notice of Class
5 Action Settlement, the May 24, 2022 Order Granting Preliminary Approval of Class Action
6 Settlement, the [Proposed] Order Granting Final Approval of Class Action Settlement and
7 Entering Judgment, the Court's files in this matter, including but not limited to the Motion for
8 Preliminary Approval of Class Action Settlement, and any other documents or evidence the
9 Court may consider at the hearing.

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13 Dated: September 30, 2022

14 By: 
15 Diana M. Khoury, Esq.
16 Rosemary C. Khoury, Esq.
17 Attorneys for Plaintiff Luis Lopez