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11 Attorneys for Plaintiff Luis Lopez,
12 individually and on behalf of all similarly-situated and aggrieved employees

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF LOS ANGELES**

15 LUIS LOPEZ, individually and on behalf of) Case No. 20STCV34691
16 all similarly-situated and aggrieved)
17 employees,)

18 Plaintiff,

19 vs.
20

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

24 Defendants.
25

) ASSIGNED FOR ALL PURPOSES TO:
) The Honorable William F. Highberger
) Dept. SS 10

) **CLASS AND REPRESENTATIVE ACTION**

) **NOTICE OF MOTION AND MOTION FOR**
) **ORDER GRANTING PRELIMINARY**
) **APPROVAL OF CLASS ACTION**
) **SETTLEMENT, CONDITIONAL**
) **CERTIFICATION, APPROVAL OF CLASS**
) **NOTICE AND SETTING OF FINAL**
) **FAIRNESS HEARING DATE**

) Date: May 16, 2022
) Time: 10:00 a.m.
) Dept: SS 10
) Judge: William F. Highberger

) Filed: September 11, 2020
) Trial date: None set
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1 PLEASE TAKE NOTICE that on May 16, 2022 at 10:00 a.m., or as soon as the matter may
2 be heard before the Hon. William F. Highberger in Department 10 of the above-entitled Court in
3 the Spring Street Courthouse located at 312 North Spring Street, Los Angeles, California 90012
4 pursuant to California Rules of Court 3.769, Plaintiff Luis Lopez, on behalf of himself and all
5 others similarly- situated and aggrieved employees, will and does move this Court for an Order:

6 1. Preliminarily approving the Class and Representative Action Settlement as fair,
7 adequate, and reasonable based upon the terms set forth in the Joint Stipulation of Settlement and
8 Release of Class Action (“Settlement Agreement”), including payment by Defendant GE United
9 Technologies, LLC of the non-reversionary \$350,500 Gross Settlement Amount for the benefit of
10 606 Class Members;

11 2. Conditionally certifying the above-captioned case as a class action for settlement
12 purposes only;

13 3. Preliminarily approving payment of reasonable attorneys’ fees of \$116,833 and
14 litigation costs of up to \$15,000 from the Gross Settlement Amount;

15 4. Preliminarily approving the Class Representative Service Payment award of \$5,000
16 to the Plaintiff, as compensation for the burdens, responsibilities, time, effort, and risks involved in
17 coming forward on behalf of the Class;

18 5. Preliminarily approving the PAGA Payment of \$5,000 of which \$3,750 (75%) will
19 be paid to the California Labor Workforce and Development Agency for all applicable civil
20 penalties pursuant to California Labor Code section 2698, *et seq.*, and \$1,250 (25%) will be
21 distributed to PAGA Members on a proportionate basis.

22 6. Preliminarily approving Simpluris as the Settlement Administrator, and further
23 approving distribution of an amount up to \$13,000 from the Gross Settlement Amount to cover its
24 expenses in noticing and administering this Settlement;

25 7. Approving the proposed Notice of Class Action Settlement (“Notice”), and
26 directing distribution of it to the Class, together with the Change of Address form and pre-printed
27 return envelope (collectively, “Notice Packet”). The Notice advises the Class of the pendency of
28 Class Action, the proposed Settlement, the timing, manner and procedure for requests for

1 exclusion and objections to the Settlement, of the automatic payment of their share of the
2 settlement funds without a claim form and the releases to be given in exchange for such payment,
3 and of the final approval hearing date, time and place; and

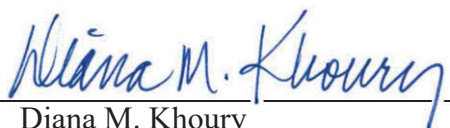
4 8. Setting a hearing date to consider the final approval of the Settlement, including Class
5 Counsel's application for attorneys' fees, litigation costs, the Class Representative Service
6 Payment, and the Administrator's expenses.

7 Pursuant to Rule of Court 3.769(c), this motion is brought because the Parties have reached
8 a tentative Settlement they believe to be fair, reasonable and adequate and in the best interests of
9 the Class and the Parties. This motion is based on this Notice of Motion, the Memorandum of
10 Points and Authorities in Support, Declaration of Class Counsel Diana M. Khoury and Rodney
11 Mesriani, Declaration of Class Representative Luis Lopez, Declaration of Michael Bui on behalf of
12 Simpluris, the Settlement Agreement and its exhibits, and the [Proposed] Order Granting
13 Preliminary Approval of Class Action Settlement filed and served herewith, the Court's files in
14 this matter, and any and all other documents or evidence which the Court may consider at the
15 hearing of this Motion.

16 Respectfully submitted,

17 COHELAN KHOURY & SINGER
18 MESRIANI LAW GROUP

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20 Dated: March 25, 2022

21 By: 
22 Diana M. Khoury
23 Attorneys for Plaintiff Luis Lopez and the Putative
24 Class
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