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Attorneys for Plaintiff Juan Salvador Villanueva,
individually, and on behalf of all other similarly
situated employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE COUNTY – CIVIL COMPLEX CENTER**

JUAN SALVADOR VILLANUEVA,
YESENIA BERMUDEZ, ISABEL
HERRERA, as individuals and on behalf of
other similarly situated employees,

Plaintiff,
vs.

LA CARRETA SUPERMARKETS, INC., a
California corporation, and DOES 1-50,
inclusive,

Defendant.

Case No.: 30-2020-01166375-CU-OE-CXC

Assigned for all purposes to:
Hon. Lon F. Hurwitz
Dept. CX 103

**PLAINTIFF'S NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: April 14, 2023
Time: 1:30 p.m.
Place: Department CX 103

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

2 **PLEASE TAKE NOTICE** that on April 14, 2023 at 1:30 p.m., or as soon thereafter as counsel
3 may be heard, in Department CX 103 of the above-captioned court, located at 751 W Santa Ana Blvd,
4 Santa Ana, CA 92701, the Honorable Lon F. Hurwitz, presiding, Plaintiffs Juan Salvador Villanueva,
5 Yesenia Bermudez and Isabel Herrera will, and hereby does, move this Court to:

6 1. Preliminarily approve the settlement described in the Stipulation of Class Action
7 Settlement (attached as **Exhibit A** to the Declaration of Armond M. Jackson), which contains the
8 principal terms of the class action settlement between Plaintiffs Juan Salvador Villanueva, Yesenia
9 Bermudez and Isabel Herrera will and Defendant La Carreta Supermarkets, Inc.;

10 2. Conditionally certify the proposed Settlement Class;

11 3. Approve distribution of the proposed Notice of Class Action;

12 4. Appoint Plaintiff Juan Salvador Villanueva, Yesenia Bermudez and Isabel Herrera as
13 the class representatives;

14 5. Appoint Jackson APC as class counsel;

15 6. Appoint ILYM Group, Inc. as the settlement administrator; and

16 7. Set a hearing date for final approval of the settlement.

17 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
18 Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3)
19 the Declaration of Armond M. Jackson; (4) the Declaration of Juan Salvador Villanueva, Yesenia
20 Bermudez and Isabel Herrera; (5) the Notice of Class Action Settlement; (6) the [Proposed] Order
21 Granting Preliminary Approval of the Stipulation of Class Action Settlement; (7) the records, pleadings,
22 and papers filed in this action; and (8) such other documentary and oral evidence or argument as may be
23 presented to the Court at or prior to the hearing of this Motion.

24 Dated: March 20, 2023

Respectfully submitted,

25 By: /s/ Armond M. Jackson

Armond M. Jackson, Esq.

Andrea M. Fernandez-Jackson, Esq.

Anthony S. Filer, Jr., Esq.

JACKSON APC

Attorneys for Plaintiff Juan Salvador Villanueva and
28 all other similarly situated employees