

JCL LAW FIRM, APC

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Attorneys for Plaintiff MICHAEL HONEA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF IMPERIAL

MICHAEL HONEA, an individual, on behalf
of himself and on behalf of all persons
similarly situated,

Plaintiff,

v.

SPENCER CONSTRUCTION LLC, a
Limited Liability Company; and DOES 1
through 50, inclusive,

Defendants.

Case No. ECU001860

**NOTICE OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: June 29, 2023
Time: 8:30 a.m.

Judge: Hon. Jeffrey B. Jones
Dept.: 7

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on June 29, 2023, or as soon
3 thereafter as the matter can be heard, in Department 7 of the above-entitled Court, before the
4 Honorable Judge Jeffrey B. Jones, Plaintiff Michael Honea (“Plaintiff”) will apply for an order
5 will apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and
6 (2) Entry of the Final Approval Order and Judgment.

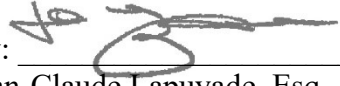
7 This Motion is brought in accordance with the Preliminary Approval Order dated October
8 31, 2022, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action
10 Claims and Release of Claims (hereinafter collectively the “Agreement”), the Declaration of
11 Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Nathalie
12 Hernandez (the Settlement Administrator), the Declaration of the Plaintiff, and the complete files
13 and records in this action.

14 Because all parties have agreed to the proposed class settlement and have met and
15 conferred regarding the motion, this motion is not opposed by Defendant. To date, there have
16 been no objections submitted by the Class.

17 Respectfully submitted,

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19 Dated: June 5, 2023

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20 By: 
21 Jean-Claude Lapuyade, Esq.
22 Attorneys for Plaintiff
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