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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

ANGEL CHAPPARO, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

IMMANUEL BAPTIST CHURCH OF SAN
BERNARDINO AND HIGHLAND,
CALIFORNIA, a California non-profit
corporation; IMMANUEL BAPTIST
CHURCH, a California non-profit corporation,
and DOES 1 through 50, Inclusive;

Defendants.

Case No. CIVSB 2101240

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

Date: December 13, 2022

Time: 10:00 a.m.

Judge: Hon. David Cohn

Dept.: S-26

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on December 13, 2022, or as soon
3 thereafter as the matter can be heard, in Department S-26 of the above-entitled Court, before the
4 Honorable Judge David Cohn, Plaintiff ANGEL CHAPPARO (“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 August
8 15, 2022, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Class and Representative Action Settlement Agreement
10 and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, the
11 Declaration of Jean-Claude Lapuyade, the Declaration of Karen Hernandez, (the Settlement
12 Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

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

16 Respectfully submitted,

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18 DATED: November 17, 2022

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19 By: 
20 Jean-Claude Lapuyade
21 Attorney for Plaintiff
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