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Attorneys for Plaintiff WAFA MWANES

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

WAFA MWANES, an individual, on behalf of
herself, and on behalf of all persons similarly
situated,

Plaintiff,

vs.

ABOUT FOOD INC. dba RELANDS RANCH
MARKET, an unknown business entity; and
DOES 1 through 50, Inclusive,

Defendants.

Case No. CIVDS2018742

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

Date: August 14, 2023

Time: 1:30 p.m.

Judge: Hon. Joseph T. Ortiz

Dept.: S-17

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

2 PLEASE TAKE NOTICE that on August 14, 2023, at 1:30 p.m., or as soon thereafter as counsel
3 may be heard, in Department S-17 of the San Bernardino Superior Court, the Honorable Judge Joseph
4 T. Ortiz presiding, plaintiff WAFA MWANES will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Class and PAGA
6 Action Claims and Release of Claims (“Agreement”) attached as Exhibit 1 to the Declaration of Jean-
7 Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Class Action Settlement to the
10 Settlement Class;

11 4. Appoint Plaintiff WAFA MWANES as the Class Representative;

12 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Lawyers for Justice,
13 PC, as Class Counsel; and

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

15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
17 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 Declaration of Edwin Aiwazian, Esq., (6) the Declaration of Wafa Mwanes; (7) the Stipulation of
19 Class and PAGA Action Claims and Release of Claims and exhibit attached thereto; (8) the [Proposed]
20 Order Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits attached
21 thereto; (9) the records, pleadings, and papers filed in this action; and (10) upon such other
22 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
23 of this Motion.

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1 As this Motion is unopposed, the Parties respectfully request relief from the page limit
2 requirement set by California Rules of Court, Rule 3.1113(d).

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4 Dated: July 6, 2023

JCL LAW FIRM, APC

5 By: 
6 Jean-Claude Lapuyade, Esq.
7 Attorneys for Plaintiff
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