

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
Facsimile: (858) 404-9203
Website: www.zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 559-8292
Facsimile: (619) 559-8291
Website: www.jcl-lawfirm.com

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA**

DEBBIE FELIX, an individual; RICK
MALEAD, an individual, on behalf of
themselves, and on behalf of all persons
similarly situated, and in their representative
capacity on behalf of the State of California
and fellow Aggrieved Employees,

Plaintiffs,

vs.

TVI, INC., d.b.a. SAVERS, a Washington
corporation; and DOES 1 through 50,
Inclusive;

Defendants.

Case No: 21CV376407

**NOTICE OF MOTION AND
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS SETTLEMENT**

Date: February 17, 2022
Time: 1:30 P.M.
Dept.: 1

Action Filed: February 24, 2021

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 1:30 pm on February 17, 2022, or as soon
thereafter as the matter can be heard, in Department 1 of the above-entitled Court, before the
Honorable Judge Sunil R. Kulkarni, Plaintiffs Debbie Felix and Rick Melead ("Plaintiffs") will
apply for an order will apply for an order granting (1) Final Approval of the Class Action
Settlement, and (2) Entry of the Final Approval Order and Judgment.

1 This Motion is brought in accordance with the Preliminary Approval Order dated August
2 27, 2021, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
3 accompanying points and authorities, the Class Action Settlement Agreement (hereinafter the
4 “Agreement”), the Declaration of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the
5 Declaration of Lluvia Islas, (the Settlement Administrator), the Declaration of the Plaintiffs, and
6 the complete files and records in this action.

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

10 Respectfully submitted,

11
12 DATED: January 25, 2022

ZAKAY LAW GROUP, APLC

13 By: 
14 Shani O. Zakay
15 Attorney for Plaintiffs
16
17
18
19
20
21
22
23
24
25
26
27
28