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Attorneys for Plaintiff Bethany A. Butler, on behalf of herself  
and similarly-situated and aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF SACRAMENTO**

BETHANY A. BUTLER, on behalf of  
herself and similarly-situated and aggrieved  
employees,

Plaintiff,

v.

POWERSCHOOL GROUP LLC, a  
Delaware Limited Liability Company; and  
DOES 1 through 10, Inclusive,

Defendants.

Lead Case No. 34-2021-00299363-CU-OE-GDS  
ASSIGNED FOR ALL PURPOSES TO:

The Honorable Jill H. Talley  
Department 23

**CLASS AND REPRESENTATIVE ACTION**

**NOTICE OF MOTION AND PLAINTIFF'S  
MOTION FOR FINAL APPROVAL OF  
CLASS, REPRESENTATIVE, AND  
COLLECTIVE ACTION SETTLEMENT**

Date: January 10, 2025

Time: 9:00 a.m.

Dept.: 23

Judge: Honorable Jill H. Talley

Complaint filed: April 26, 2021

Trial date: Not set

PLEASE TAKE NOTICE, on January 10, 2025 at 9:00 a.m., or as soon as the matter may be heard in Department 23 of the above-captioned court, located at Gordon D. Schaber Courthouse, 720 9th Street, Sacramento, California, 95814, the Honorable Jill H. Talley presiding, Plaintiff Bethany A. Butler, on behalf of herself and putative class, will move this Court for an Order Granting Final Approval of Class, PAGA, and Collective Action Settlement as set forth in the Stipulation of Class, Collective, and Representative Action Settlement filed December 12, 2023 (“Agreement”).

Plaintiff moves this Court to:

1. Finally adjudicate the Settlement is fair, reasonable, and adequate;
2. Direct distribution of Individual Class, Collective and PAGA Payments by the Administrator to all Participating Class Members, Settlement Collective Members and PAGA Group Members in accordance with the Agreement;
3. Approve, and direct payment to Class Counsel of, the Class Counsel Fees Payment of \$299,617.33 and the Class Counsel Litigation Expenses Payment of \$20,098.00.
4. Approve and direct the Class Representative Enhancement Payment of \$10,000.00 to named Plaintiff Bethany A. Butler.
5. Approve, and direct the payment to appointed Settlement Administrator Rust Consulting, Inc. of, the Settlement Administration Costs of \$13,085.00 for administering the Settlement;
6. Approve the LWDA Payment to California’s Labor and Workforce Development Agency of \$37,500.00 (75% of \$50,000.00); and,
7. Direct the Clerk of the Court to enter final judgment, and without affecting the finality of the final judgment, reserve the Court’s jurisdiction over the Parties to enforce the Agreement.

This proposed Settlement, preliminarily approved by this Court on January 16, 2024, is the product of arms’-length, good-faith negotiations, is fair and reasonable to the Class, and should be finally approved, as more fully discussed in the accompanying Memorandum in Support of Final Approval.

1 This motion is made based on this Notice, Points and Authorities, Declarations of Class  
2 Counsel Michael D. Singer and Emil Davtyan, Declaration of Class Representative Bethany  
3 Butler filed December 12, 2023, Declaration of Amy Fringer, on behalf of Rust, the Agreement  
4 and Notice of Preliminary Approval of Class Action Settlement, Order Granting Preliminary  
5 Approval of Class, Representative, and Collective Action Settlement issued January 16, 2024,  
6 the [Proposed] Order Granting Final Approval of Class, Representative, and Collective Action  
7 Settlement, the [Proposed] Judgment, the Court's files in this matter, and any other documents  
8 or evidence the Court may consider at the hearing.

9 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of  
10 this matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative  
11 ruling may be downloaded off the court's website. If the party does not have online access, they  
12 may call the dedicated phone number for the department as referenced in the local telephone  
13 directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the hearing and  
14 receive the tentative ruling. If you do not call the court and the opposing party by 4:00 p.m. the  
15 court day before the hearing, no hearing will be held.

16 Respectfully submitted,

17 COHELAN KHOURY & SINGER  
18 D.LAW, INC.

19  
20 Dated: December 17, 2024

21 By: 

22 Michael Singer, Esq.

23 Rosemary C. Khoury, Esq.

24 Attorneys for Plaintiff Bethany A. Butler, on behalf of  
25 herself and similarly-situated and aggrieved employees  
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