

ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MERCED

KALAINA A. DULA, an individual, on behalf
of herself, and on behalf of all persons
similarly situated,

Plaintiff,

v.

2 KINGS GAMING, INC., a California
corporation; and DOES 1-50, inclusive,

Defendants.

Case No: 20CV-02289

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

Hearing Date: April 6, 2022
Hearing Time: 8:15 a.m.

Honorable Judge Brian McCabe
Department 8

Trial Date: Not Set
Action Filed: August 12, 2020

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at **8:15 a.m.** on **April 6, 2022**, or as soon thereafter as the matter can be heard, in Department 8 of the above entitled Court, before the Honorable Judge Brian McCabe, Plaintiff KALAINA A. DULA (“Plaintiff”) will apply for an order (1) preliminary approving the proposed settlement of the Action with Defendant 2 KINGS GAMING, INC. (“Defendant”); (2) approving the form and method for providing class-wide notice; (3) directing that notice of the proposed settlement be given to the class; and (4) scheduling a final approval hearing date to consider Plaintiff’s motion for final approval of the settlement and entry of the Judgment, and Plaintiff’s motion for approval of attorneys’ fees and litigation expenses.

This motion for preliminary approval of the class and PAGA action settlement is brought pursuant to California Rules of Court, rule 3.769. Plaintiff's motion will be based on this notice of motion and motion, the accompanying points and authorities, the Declarations of Shani O. Zakay and Jean-Claude Lapuyade, the Stipulation of Class Action and PAGA Settlement (the "Agreement") between the parties, and the complete files and records in this action. All parties have agreed to the proposed class and PAGA settlement and have met and conferred regarding the motion; therefore, this motion is not opposed by Defendant. As this Motion is unopposed, the Parties respectfully request relief from the page limit requirement set by California Rules of Court, Rule 3.1113(d).

Respectfully submitted,

Dated: March 7, 2022

ZAKAY LAW GROUP, APLC

By:

Shani O. Zakay
Attorney for Plaintiff