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Attorneys for Plaintiff SCOTT HARP, on
behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN - BAKERSFIELD

SCOTT HARP, on behalf of himself and all
others similarly situated,

Plaintiffs,

v.

CALIFORNIA CEMETERY AND
FUNERAL SERVICES, LLC, a Delaware
corporation; and DOES 1 to 100, inclusive,

Defendants.

CLASS ACTION

Case No.: BCV-21-101299 JEB

**PLAINTIFF'S NOTICE OF MOTION
FOR SETTLEMENT UNDER THE
CALIFORNIA LABOR CODE
PRIVATE ATTORNEYS GENERAL
ACT; MEMORANDUM OF POINTS
AND AUTHORITIES; DECLARATION
OF KEVIN T. BARNES and
[PROPOSED] ORDER IN SUPPORT
THEREOF**

Hearing Date: May 9, 2024
Hearing Time: 8:30 a.m.

Honorable Gregory A. Puskamp
Division J

Action filed: June 8, 2021
Trial Date: None Set

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

2 **PLEASE TAKE NOTICE** that on May 9, 2024 at 8:30 a.m. in Department J
3 of the above-entitled court, located at 1215 Truxtun Avenue, Bakersfield, CA 93301, Plaintiff
4 Scott Harp will move the Court for an Order Granting Settlement Under the California Labor
5 Code Private Attorneys General Act.

6 The Motion will be made on the grounds that the proposed Settlement is fair, adequate,
7 reasonable, and in the best interest of Plaintiff, all aggrieved employees, and the Parties.

8 The Motion will be based on this Notice of Motion, the attached Memorandum of Points
9 and Authorities, the Declaration of Kevin T. Barnes, the PAGA Settlement Agreement and
10 Release (**Exhibit 1** to the concurrently filed Declaration of Kevin T. Barnes), all other papers
11 and records on file in this action, and on such oral and documentary evidence as may be
12 presented at the hearing on this Motion.

13 Dated: March 21, 2024

LAW OFFICES OF KEVIN T. BARNES

14 By: 
15 Kevin T. Barnes, Esq.
16 Gregg Lander, Esq.
Attorneys for Plaintiffs