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Attorneys for Plaintiffs Angelyna Celio, Matthew Lytle, Robert Martin, and Donell Fort on behalf of themselves and all others similarly situated

SUPERIOR COURT OF CALIFORNIA

COUNTY OF ALAMEDA

ANGELYNA CELIO, MATTHEW LYTLE,
ROBERT MARTIN, and DONELL FORT,
on behalf of themselves and others similarly
situated

Plaintiffs,

v.

AIR INTERNATIONAL US, INC., a
Delaware Corporation; and DOES 1
Through 10, inclusive,

Defendants.

Case No. RG21098764

ASSIGNED FOR ALL PURPOSES TO:

The Honorable James Reilly
Department 25

CLASS AND REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION FOR
ORDER GRANTING PRELIMINARY
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT, CONDITIONAL
CERTIFICATION, APPROVAL OF CLASS
NOTICE, AND SETTING A FINAL
APPROVAL HEARING DATE**

Hearing Information

Date: August 16, 2023

Time: 3:00 p.m.

Dept: 25

Judge: Hon. James Reilly

Reservation No: 405363008773

Complaint filed: May 10, 2021

Trial Date: Not Set

PLEASE TAKE NOTICE that on August 16, 2023 at 3:00 p.m. or as soon as the matter may be heard in Department 25 of the Rene C. Davidson Courthouse of Alameda County Superior Court located at 1221 Oak Street, Oakland, California 94612, the Honorable James Reilly presiding, Plaintiffs Angelyna Celio, Matthew Lytle, Robert Martin, and Donell Fort, on behalf of themselves and the putative Class, will move this Court for an Order:

1. Preliminarily approving the Class Action Settlement as fair, adequate, and reasonable based on terms set forth in the Class Action and PAGA Representative Action Settlement and Release of Claims (“Agreement”) and Addendum to Class Action and PAGA Representative Action Settlement and Release of Claims (“Addendum”), including payment by Defendant Air International US, Inc. of the Gross Settlement Amount of \$600,000.00

2. Conditionally certifying the case as a class action for settlement purposes only;

3. Approving Notice of Class Action Settlement be mailed via first class U.S. Mail to all members of the Settlement Class advising them of the: pendency of Class Action; proposed Settlement; manner and procedure for submitting requests for exclusion and objections to the Settlement; automatic payment of their share of the Settlement funds without the need to return a claim form; date set for the final approval hearing; and, of the right to appear at the Final Approval hearing;

4. Appointing Cohelan Khoury & Singer and Stonebrook Law as Class Counsel;

5. Appointing Plaintiffs Angelyna Celio, Matthew Lytle, Robert Martin, and Donell Fort as Class Representatives;

6. Appointing CPT Group, Inc. as the Settlement Administrator;

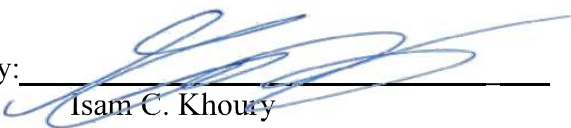
7. Setting a hearing date to consider final approval of the Settlement.

This motion is based on this Notice of Motion, the Memorandum of Points and Authorities in Support, Declarations of Class Counsel Isam C. Khoury and Joseph Tojarieh, Declarations of Plaintiffs Angelyna Celio, Matthew Lytle, Robert Martin, and Donell Fort, Declaration of Julie Green, on behalf of CPT Group, Inc., the Class Action and PAGA Representative Action Settlement Agreement and Release of Claims, the Addendum to Class Action and PAGA Representative Action Settlement and Release of Claims, and the [Proposed]

1 Order Granting Preliminary Approval of Class Action and PAGA Representative Action
2 Settlement, the Court's files in this matter, and any other documents or evidence which the
3 Court may consider at the hearing.

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5 COHELAN KHOURY & SINGER

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7 Dated: March 7, 2023

8 By: 

Isam C. Khoury

Michael D. Singer

Marta Manus

9 Attorneys for Plaintiffs Angelyna Celio, Matthew
10 Lytle, Robert Martin, and Donell Fort, on behalf
11 of themselves and all others similarly situated
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Superior Court of Alameda County Public Portal

Make a Reservation

Celio VS Air International US, INC.

Case Number: RG21098764 Case Type: Unlimited Civil Category: Other Employment Complaint Case
Date Filed: 2021-05-10 Location: Rene C. Davidson Courthouse - Department 25

Reservation

Case Name: Celio VS Air International US, INC.	Case Number: RG21098764
Type: Motion to Confirm Settlement	Status: RESERVED
Filing Party: Angelyna Celio (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 25
Date/Time: 08/16/2023 3:00 PM	Number of Motions: 1
Reservation ID: 405363008773	Confirmation Code: CR-HQJ8LRASYTI2LHFV

Fees

Description	Fee	Qty	Amount
Motion to Confirm Settlement	0.00	1	0.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: Visa
Account Number: XXXX1797	Authorization: 00208D
Payment Date: 1969-12-31	

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