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Attorneys for Plaintiff Victor Erazo,
individually, and on behalf of all other similarly situated employees

**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE—CIVIL COMPLEX CENTER**

VICTOR ERAZO, as an individual, and on
behalf of other similarly situated employees,

Plaintiff,
vs.

UNI-CAPS, LLC., a California corporation;
and DOES 1 through 50, inclusive,

Defendant.

) Case No.: 30-2021-01193402-CU-OE-CXC

) Assigned for all purposes to:
) Hon. Randall J. Sherman
) Dept. CX-105

) **NOTICE OF MOTION FOR FINAL
) APPROVAL OF CLASS ACTION
) SETTLEMENT**

) Date: January 31, 2025
) Time: 9:00 a.m.
) Place: Department CX-105

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

2 **PLEASE TAKE NOTICE THAT** on January 31, 2025 at 9:00 a.m., or as soon
3 thereafter as the matter may be heard at the above titled court, located at 751 West Santa Ana
4 Blvd., Santa Ana, CA 92701, Dept. CX105, the Honorable Randall J. Sherman presiding,
5 Plaintiff Victor Erazo will and hereby does move the Court, pursuant to Code of Civil Procedure
6 § 382 for an Order granting final approval of the Proposed Stipulation of Class Action
7 Settlement (“Settlement Agreement”) entered into between the Plaintiff, on behalf of itself and
8 all others similarly situated, and Defendant Uni-Caps. LLC. (“Defendants”).

9 This Motion is based upon; (1) this Notice of Motion and Motion; (2) the Memorandum
10 of Points and Authorities in Support of the Motion for Final Approval of Class Action
11 Settlement; (3) the Declaration of Armond M. Jackson; (4) Declaration of Claims Administrator;
12 (5) Settlement Agreement; (6) Declaration of Plaintiff; (7) the [Proposed] Order Granting Final
13 Approval of Class Action Settlement; (8) the records, pleadings, and papers filed in this action;
14 and (9) upon such other documentary and oral evidence or argument as may be presented to the
15 Court at or prior to the hearing of this Motion.
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18 Dated: January 8, 2025

JACKSON APC

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20 By: /s/ Armond M. Jackson
21 Armond M. Jackson
22 Attorney for Plaintiff Victor Erazo
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