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Attorneys for Plaintiff Sunny K. Tam, on behalf of himself
and other similarly-situated employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

SUNNY K. TAM, on behalf of himself and
other similarly-situated employees

Plaintiff,

v.

Q TECH CORPORATION, a California
Corporation; and DOES 1 Through 10,
inclusive,

Defendants.

Lead Case No. 21STCV18635

Related Case No. 21STCV19805

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Elihu M. Berle

Department SS6

**CLASS ACTION AND REPRESENTATIVE
ACTION**

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT, ATTORNEYS' FEES AND
COSTS, AND CLASS REPRESENTATIVE
SERVICE PAYMENT**

Hearing Information

Date: March 22, 2023

Time: 9:00 a.m.

Dept: SS-6

Judge: Hon. Elihu M. Berle

Complaint filed: May 17, 2021

Trial date: Not Set

1 PLEASE TAKE NOTICE that on March 22, 2023, at 9:00 a.m., or as soon as the matter may
2 be heard in Courtroom SS6 of the above-captioned court, located at 321 North Spring Street, Los
3 Angeles, California, 90012, the Honorable Elihu M. Berle presiding, Plaintiff Sunny K. Tam, on behalf
4 of himself and the provisionally certified class, will move this Court for an Order Granting Final
5 Approval of Class Action and PAGA Settlement, Attorneys' Fees and Litigation Costs, AND Class
6 Representative Service Payment.

7 The Motion will be made on the grounds that the proposed Settlement is fair, adequate,
8 reasonable, and in the best interest of Plaintiff and all Class Members.

9 The Motion will be based on this Notice of Motion, the attached Memorandum of Points and
10 Authorities, the Declarations of Class Counsel Michael D. Singer and Joseph Tojarieh, the Declaration
11 of the Class Representative Sunny K. Tam, the Declaration of Makenna Snow of ILYM Group, Inc.,
12 the Settlement Administrator, and all other papers and records on file in this action, and on such oral
13 and documentary evidence as may be presented at the hearing on this Motion.

14 Respectfully submitted,

15 **COHELAN KHOURY & SINGER**
16 **STONEBROOK LAW**

17 Dated: January 20, 2023

18 By: 
19 Michael D. Singer
20 Joseph Tojarieh
21 Counsel for Plaintiff Sunny Tam
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