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Attorneys for Plaintiff

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN MATEO

LUIS R. CHAVARRIA RAMIREZ,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiff,

v.

PROSPECT INTERNATIONAL AIRPORT
SERVICES CORPORATION, a Nevada
corporation; PROSPECT AIRPORT
SERVICES, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21-CIV-03392

[Consolidated with Case No. 21-CIV-03393]

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION FOR FINAL APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: June 17, 2025

Time: 2:00 p.m.

Dept: 4

FAC Filed: January 10, 2024

Jury Trial Date: None Set

TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on June 17, 2025, at 2:00 p.m., in Department 4 of this Court, Plaintiff Luis R. Chavarria Ramirez (Plaintiff”) will and hereby does move this Court for an Order as follows:

1. Granting final approval of the Amended Joint Stipulation of Settlement (“Settlement”), attached as Exhibit 1 to the Declaration of Esther L. Bylsma in Support of Plaintiff’s Supplemental Brief in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement, filed in the above-captioned action on November 27, 2024;

2. Finding that the Settlement is fair, reasonable, and adequate;

3. Finally certifying the proposed Class for settlement purposes only;

4. Appointing Plaintiff as Class Representative and Schneider Wallace Cottrell Konecky LLP and Lawyers for Justice, PC as Class Counsel and finally approving the requested service award for Plaintiff and the requested attorneys’ fees and costs for Class Counsel;¹

5. Finally approving the proposed PAGA allocation in the amount of \$100,000.00 from the Gross Settlement Amount, from which 75% (\$75,000.00) will be paid to the Labor and Workforce Development Agency (“LWDA”) and 25% (\$25,000) will be distributed to the Aggrieved Employees on a pro-rata pay-period basis;

6. Finally approving payment of \$13,950.00 to Phoenix Settlement Administrators from the Gross Settlement Amount for costs incurred in administering the Settlement;

7. Entering final judgment consistent with the terms of the Settlement and this Motion and retaining jurisdiction for purposes of overseeing all settlement administration matters.

8. This Motion is based on this Notice and Motion; the accompanying Memorandum of Points and Authorities; the accompanying Declaration of Esther L. Bylsma; the accompanying Declaration of Plaintiff; the accompanying Declaration of Mayra Gonzalez; all records and

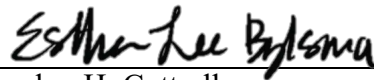
¹ This Motion will be heard in conjunction with Plaintiff’s Motion for an Award of Attorney’s Fees and Costs and Incentive Award, filed March 28, 2025, and scheduled to be heard on the same date (June 17, 2025 at 2:00 p.m. in Department 4).

1 documents on file; and such argument and evidence as may be presented at the hearing on this matter.
2 A proposed Final Approval Order and Judgment is also submitted herewith.

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5 DATE: May 21, 2025

SCHNEIDER WALLACE
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7 By:



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