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Attorneys for Plaintiff PRISCILLA LOPEZ, in a Representative capacity only, and on behalf of other members of the general public similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF IMPERIAL**

PRISCILLA LOPEZ,

Plaintiffs,

vs.

GEO SECURE SERVICES, LLC, a Florida  
Limited Liability Company; and DOES 1-10,  
inclusive,

Defendants.

AND ALL CONSOLIDATED  
LITIGATIONS.

CASE NO. ECU002060

**NOTICE OF PLAINTIFF'S *UNOPPOSED*  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: January 5, 2024

Time: 8:30 a.m.

Dept.: 7

Judge: Hon. Jeffrey B. Jones

1 TO ALL PARTIES HEREIN AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on January 5, 2024, at 8:30 a.m., or as soon thereafter as the  
3 matter may be heard in Department 7, the Honorable Jeffrey B. Jones of the above-entitled court,  
4 located at 939 Main St, El Centro, CA 92243, the named Plaintiffs PRISCILLA LOPEZ, BRITNEY  
5 CASTILLO, SAMDEESHIA BELL, TEZSANIQUE HENDRICKSON and NICKOLAS ORTIZ on  
6 behalf of a proposed class, will and hereby does move this Court for preliminary approval of the class  
7 action settlement.

8 The unopposed motion for conditional certification of settlement class and preliminary  
9 approval of the class action settlement is based upon this Notice, the Memorandum of Points and  
10 Authorities in support, the Declaration of Eric K. Yaeckel and attached Exhibits, including the  
11 Settlement Agreement, the proposed Notice, the Declaration of David D. Bibiyan, the Declaration of  
12 Zoe Yuzna, and the Proposed Order (filed herewith) and upon such other evidence and argument at  
13 the hearing.

14 Given the multiplicity of issues addressed in this Motion, Plaintiffs have expressed a need to  
15 exceed the 20-page limit set forth in California Rule of Court 3.764(c)(2), and Defendant does not  
16 oppose Plaintiffs' request for additional pages. Therefore, Plaintiffs request the Court's consideration  
17 of Plaintiffs' memorandum of points and authorities which is 26 pages in length. By design, there will  
18 be no Opposition or Reply.

19  
20  
21 Dated: December 12, 2023

**SULLIVAN & YAECKEL LAW GROUP, APC**

*Eric Yaeckel*

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24 Eric K. Yaeckel  
Ryan T. Kuhn  
Attorneys for Plaintiff PRISCILLA LOPEZ and  
25 BRITNEY CASTILLO  
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