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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN FRANCISCO**

AL-JERONE GREEN, TIFFANY
MANJARES and DOANYA PUCCINI,
individuals, on behalf of themselves and
on behalf of all persons similarly
situated,

Plaintiff,

vs.

FIVE KEYS SCHOOLS AND
PROGRAMS, a California Corporation,
and DOES 1 through 50, inclusive,

Defendants.

AL-JERONE GREEN, TIFFANY
MANJARES and DOANYA PUCCINI, on
behalf of the State of California, as private
attorney generals

Plaintiff,

vs.

FIVE KEYS SCHOOLS AND
PROGRAMS, a California Corporation,
and DOES 1 through 50, inclusive,
Defendants

Case No. CGC-21-596165

(Consolidated with Case No. CGC-21-596167)

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: October 4, 2023

Hearing Time: 9:30 a.m.

*[Hearing scheduled by Order dated March 29,
2023 at paragraph 12; and rescheduled by Order
dated August 3, 2023]*

Judge: Hon. Richard B. Ulmer
Dept: 302

Action Filed: October 20, 2021

Trial Date: Not Set

1 **TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on October 4, 2023 or as soon
3 thereafter as the matter can be heard, in Department 302 of the above-entitled Court before the
4 Honorable Richard B. Ulmer, Plaintiffs Al-Jerone Green, Tiffany Manjares, and Doanya
5 Puccini (“Plaintiffs”) will move for an order granting (1) Final Approval of the Class Action
6 Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This motion is brought in accordance with the Orders dated March 29, 2023 and August
8 3, 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice,
9 the accompanying points and authorities, the Declaration of Norman Blumenthal, the
10 Declaration of Cassandra Polites of ILYM Group, Inc. (the Settlement Administrator), the
11 Declarations of the Plaintiffs, Class Action Settlement Agreement (“Agreement”), and the
12 complete files and records in this action.

13 Because Plaintiffs and Defendant Five Keys Schools and Programs (“Defendant”) have
14 agreed to the proposed class settlement and have met and conferred regarding the motion, this
15 motion is not opposed. Currently, there have been no objections submitted by the Class.

16 Respectfully submitted,

17 Dated: September 7, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

19 By: /s/ Kyle Nordrehaug
20 Norman B. Blumenthal
21 Kyle R. Nordrehaug
22 Attorney for Plaintiffs
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