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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

SALVADOR VENEGAS and SERGIO
LAINEZ, on behalf of themselves and on
behalf of all persons similarly situated,
and on behalf of the State of California, as
private attorney generals,

Plaintiffs,

vs.

WWF OPERATING COMPANY, LLC, a
Limited Liability Company; DANONE
NORTH AMERICA PUBLIC BENEFIT
CORPORATION, a Corporation;
DANONE US, LLC, a Limited Liability
Company; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: **21STCV20991**

[Consolidated with Case No. 21PSCV00643 and
Case No. 21PSCV01017]

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

Hearing Date: October 30, 2023

Hearing Time: 9:30 a.m.

[Hearing scheduled by Order dated June 29,
2023]

Judge: Hon. Maren E. Nelson
Dept: SSC-17

Action Filed: June 4, 2021

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on October 30, 2023 or as soon
3 thereafter as the matter can be heard, in Department SSC-17 of the above entitled Court before
4 the Honorable Maren Nelson, Plaintiffs Salvador Venegas and Sergio Lainez (collectively,
5 “Plaintiffs”) will move for an order granting (1) Final Approval of the Class Action Settlement,
6 and (2) Entry of the Final Approval Order and the Judgment.

7 This motion is brought in accordance with the Order dated June 29, 2023, and California
8 Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points
9 and authorities, the Declaration of Norman Blumenthal, the Declaration of Edwin Aiwarzian,
10 the Class Action and PAGA Settlement Agreement (the “Agreement”), the Declaration of
11 Nicole Bench (the Administrator), the Declarations of the Plaintiffs, and the complete files and
12 records in this action.

13 Because Plaintiffs and Defendants WWF Operating Company, LLC, Danone North
14 America Public Benefit Corporation and Danone US, LLC (“Defendants”) have agreed to the
15 proposed class settlement and have met and conferred regarding the motion, this motion is not
16 opposed. There have been no objections submitted by the Class.

17 Respectfully submitted,

18 Dated: October 5, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

20 By: /s/ Kyle Nordrehaug
21 Norman B. Blumenthal, Esq.
22 Kyle R. Nordrehaug, Esq.

23 Attorneys for Plaintiffs
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