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Attorney for Plaintiff and all others similarly situated and the general public

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

RORY MASSEY, on behalf of himself and all
others similarly situated and the general public,

Plaintiffs,

v.

MANN+HUMMEL WATER AND FLUID
SOLUTIONS, INC., a Delaware corporation;
MICRODYN-NADIR US, INC., a business form
unknown; and DOES 1 to 100, inclusive,

Defendants

) Case No.: 21CV02965
) Hon. Colleen K. Sterne
) Dept. 5
) CLASS ACTION

) **NOTICE OF MOTION FOR
) CONDITIONAL CERTIFICATION
) AND PRELIMINARY APPROVAL OF
) CLASS ACTION AND PAGA
) SETTLEMENT**

) Date: November 28, 2022
) Time: 10:00 a.m.
) Dept.: 5

) Action filed: July 27, 2021
) Trial Date: Not Set
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)
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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

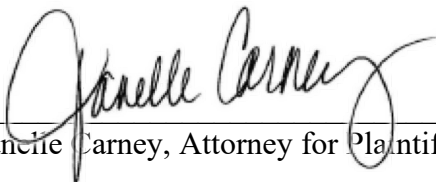
2 PLEASE TAKE NOTICE that on November 28, 2022, at 10:00 a.m., or as soon
3 thereafter as the matter may be heard by the Honorable Colleen K. Sterne in Department 5 of the
4 Santa Barbara Superior Court, located at 1100 Anacapa St., Santa Barbara, CA 93101, Plaintiff
5 Rory Masse, will move for an order granting conditional certification and preliminary approval
6 of the class action and PAGA settlement. Good cause exists for the granting of the Motion in that
7 the proposed settlement is fair, reasonable and adequate.

8 The Motion will be based on this Notice of Motion, the Declarations of Janelle Carney,
9 Manny Starr, and Rory Massey; the Memorandum of Points and Authorities, and on such oral
10 and documentary evidence as may be presented at the hearing on the Motion.

11 Dated: October 11, 2022

JANELLE CARNEY – ATTORNEY AT LAW, APC
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15 By:


Janelle Carney, Attorney for Plaintiff