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Attorneys for Plaintiff Gabriela Chavez, on behalf of herself
and other similarly-situated employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

GABRIELA CHAVEZ, on behalf of herself
and other similarly-situated employees

Plaintiff,

v.

SCHEID VINEYARDS INC., a Delaware
Corporation; and DOES 1 Through 10,
inclusive,

Defendants.

Case No. 21CV002126

CLASS ACTION (COMPLEX)

**NOTICE OF MOTION AND
MOTION FOR AN ORDER GRANTING
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Date: December 16, 2022

Time: 8:30 a.m.

Dept: 14

Judge: Hon. Carrie M. Panetta

Complaint filed: July 2, 2021

Trial date: Not set

1 PLEASE TAKE NOTICE, on December 16, 2022 at 8:30 a.m., or as soon as the matter
2 may be heard in Department 14 of the above-captioned court located at 1200 Aguajito Road,
3 North First Street, Monterey, California 93940, Honorable Carrie M. Panetta presiding,
4 Gabriela Chavez, on behalf of herself and putative class, will move this Court for an Order:

5 1. Preliminarily approving the Class Action and Private Attorney Generals Act
6 Settlement as fair, adequate, and reasonable based upon the terms set forth in the Class Action
7 and PAGA Settlement Agreement and Class Notice (“Agreement”), and payment by Defendant
8 Scheid Vineyards, Inc. of the \$1,250,000 Gross Settlement Amount;

9 2. Conditionally certifying the above-captioned case as a class action for
10 settlement purposes only;

11 3. Approving the Notice of Class Action Settlement be mailed together with a
12 Change of Address Form, via first class U.S. Mail to all members of the Settlement Class
13 advising them of the pendency of the Action, the proposed Settlement, the manner and
14 procedure for submitting requests for exclusion and objections to the Settlement, of the
15 automatic payment of their share of the Settlement funds without the need to return a claim
16 form, of the date set for the Final Approval hearing, and of their right to appear at the time of
17 the Final Approval hearing;

18 4. Appointing Sahag Majarian of Law Offices of Sahag Majarian II, and Michael
19 D. Singer and Isam C. Khoury of Cohelan Khoury & Singer, as Class Counsel;

20 5. Appointing Plaintiff Gabriela Chavez as Class Representative;

21 6. Appointing CPT Group, Inc. as the Settlement Administrator to administer the
22 Settlement of this matter as set forth in the Agreement; and

23 7. Setting a hearing date to consider final approval of the Settlement.

24 This motion is based on this Notice of Motion, Memorandum of Points and Authorities,
25 the Declarations of Class Counsel Isam C. Khoury and Sahag Majarian II, Plaintiff Gabriela
26 Chavez, and Julie Green for CPT Group, Inc., the Agreement, Notice of Class Action

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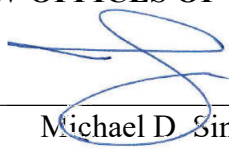
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1 Settlement, the [Proposed] Order Granting Preliminary Approval, and the Court's files in this
2 matter.

3 Respectfully submitted,

4 **COHELAN KHOURY & SINGER**
5 **LAW OFFICES OF SAHAG MAJARIAN II**

6 Dated: November 8, 2022

7 By:  _____

Michael D. Singer

Isam C. Khoury

8 Counsel for Plaintiff GABRIELA CHAVEZ, on behalf of
9 herself and other similarly-situated employees
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