

COHELAN KHOURY & SINGER

Isam C. Khoury (SBN 58759)
ikhoury@ckslaw.com
Michael D. Singer (SBN 115301)
msinger@ckslaw.com
Jeff Geraci (SBN 151519)
jgeraci@ckslaw.com
Rosemary C. Khoury (SBN 331307)
rkhoury@ckslaw.com
605 C Street, Suite 200
San Diego, CA 92101
Tel: (619) 595-3001/Fax: (619) 595-3000

LAW OFFICE OF SAHAG MAJARIAN II

Sahag Majarian (SBN 146621)
sahagii@aol.com
Garen Majarian (SBN 334104)
garen@majarianlawgroup.com
18250 Ventura Blvd.
Tarzana, CA 91356
Tel: (818) 609-0807/Fax: (818) 609-0892

Attorneys for Rebecca De Benning, on behalf of herself
and all others similarly situated

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

REBECCA DE BENNING, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION,
a Washington Corporation; and Does 1
Through 10, Inclusive,

Defendants.

Case No. 34-2021-00309030
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Jill H. Talley
Department 25

CLASS ACTION

**NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 28, 2022
Time: 9:00 a.m.
Dept: 25
Judge: Honorable Jill H. Talley
Reservation: #2667995

Complaint filed: September 30, 2021
Trial date: Not set

PLEASE TAKE NOTICE, on October 28, 2022 at 9:00 a.m., or as soon as the matter may be heard in Department 25 of the above captioned court, Gordon D. Schaber Courthouse located at 720 9th Street, Sacramento, California, 95814, Honorable Christopher E. Krueger presiding, Plaintiff Rebecca De Benning, on behalf of herself and putative class, will move this Court for an Order:

1. Preliminarily approving the Class Action Settlement as fair, adequate, and reasonable based upon the terms set forth in the Class and PAGA Action Settlement Agreement (“Agreement”), including payment by Defendant Costco Wholesale Corporation of the Gross Settlement Amount of \$9,000,000;

2. Conditionally certifying the case as a class action for settlement purposes only;

3. Approving Notice of Settlement be mailed via first class U.S. Mail to all Settlement Class members advising them of the pendency of Class Action, proposed Settlement, manner and procedure to submit requests for exclusion and objections to the Settlement, automatic payment of their share of the Settlement funds without the need to return a claim form, date set for the Final Approval hearing, and of the right to appear at the Hearing;

4. Appointing Cohelan Khoury & Singer and Law Office of Sahag Majarian II, as Class Counsel;

5. Appointing Plaintiff Rebecca De Benning as Class Representative;

6. Appointing Atticus Administration, LLC as the Settlement Administrator

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

This motion is based on this Notice, Points and Authorities, Declarations of Class Counsel Jeff Geraci and Sahag Majarian II, Class Representative Rebecca De Benning, Declaration of Chris Longley on behalf of Atticus Administration LLC, the Agreement, [Proposed] Order Granting Preliminary Approval, the Court’s files, and such evidence the Court may consider.

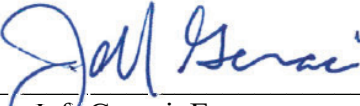
Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings for the department may be downloaded off the court’s website. If the party does not have online access, they may call the dedicated phone number for the department as referenced in the local

1 telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the
2 hearing and receive the tentative ruling. If you do not call the court and the opposing party by
3 4:00 p.m. the court day before the hearing, no hearing will be held.

4 Respectfully Submitted,

5 **COHELAN KHOURY & SINGER**
6 **LAW OFFICE OF SAHAG MAJARIAN II**

7
8 Dated: August 16, 2022

9 By: 
10 Jeff Geraci, Esq.

11 Attorneys for Plaintiff REBECCA DE BENNING, on
12 behalf of herself and all others similarly situated
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28