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Attorneys for Plaintiff Ronghui Lee
on behalf of the certified class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

LEE, RONGHUI, an individual California
resident on behalf of himself and all others
similarly situated,

Plaintiff,

vs.

HUNGRYPANDA US INC., a Delaware
corporation; and DOES 1-10, inclusive,

Defendant.

Case No. CIVSB2126633

**PLAINTIFF'S NOTICE OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT; APPOINTMENT OF
SETTLEMENT ADMINISTRATOR;
APPROVAL OF CLASS NOTICE
PACKET; AND SETTING OF FINAL
APPROVAL HEARING**

Date: August 1, 2024
Time: 8:30 a.m.
Judge: Hon. Jessica Morgan
Dept.: S-26

Action Filed: September 2, 2021
Trial Date: None

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1 **TO THE CLERK OF THE COURT AND ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE** that on August 1, 2024, at 8:30 a.m., or as soon thereafter as
3 the matter may be heard, in Department S-26 of this Court, located at 247 West 3rd St. San
4 Bernardino, CA 92415, before the Honorable Jessica Morgan, plaintiff Ronghui Lee ("Plaintiff")
5 and the certified Class in this matter will and hereby do move the Court for preliminary approval of
6 his class and PAGA action settlement; appointment of settlement administrator; approval of the
7 settlement notice; and setting of the final approval hearing.

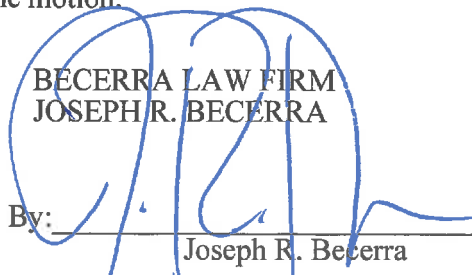
8 This motion is made on the grounds that the parties have reached a fair and reasonable
9 settlement of Plaintiff and the certified Classes' claims that will deliver substantial value to the
10 Class and the Labor and Workforce Development Agency (the "LWDA"), and the settlement is
11 deserving of approval by this Court.

12 In connection with this motion, Plaintiff has given notice to the LWDA of the settlement
13 and this motion pursuant to California Labor Code section 2699(1)(2).

14 This motion is based upon this notice; the accompanying Memorandum in Support of
15 Motion for Preliminary Approval of Class and PAGA Action Settlement; Declaration of Ronghui
16 Lee in Support; Declaration of Duo Zhao in Support; Declaration of Torey Joseph Favarote in
17 Support; Declaration of Joseph Becerra in Support; [Proposed] Order: (1) Preliminarily Approving
18 the Settlement, (2) Appointing ILYM Group, Inc. as Settlement Administrator, (3) Approving the
19 Class Notice, and (4) Setting a Hearing for Final Approval of the Settlement; the Court's record of
20 this action; all matters of which the Court may take notice; and such oral and documentary
21 evidence received by the Court at the hearing on the motion.

22 Dated: July 10, 2024

23 BECERRA LAW FIRM
JOSEPH R. BECERRA

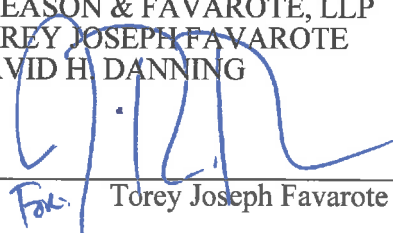
24 By: 

25 Joseph R. Becerra

26 Attorneys for Plaintiff Ronghui Lee, on
27 behalf of the certified class
28

1 Dated: July 10, 2024

2 GLEASON & FAVAROTE, LLP
3 TOREY JOSEPH FAVAROTE
4 DAVID H. DANNING

5 By: 
6 For: Torey Joseph Favarote

7 Attorneys for Plaintiff Ronghui Lee, on
8 behalf of the certified class
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PROOF OF SERVICE

I, Linda Montemayor, declare:

I am and was at the time of the service mentioned in this declaration, employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is Gleason & Favarote, LLP, 3646 Long Beach Blvd., Suite 203, Long Beach, CA 90807.

On July 10, 2024, I served a copy(ies) of the following document(s):

**PLAINTIFF'S NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT; APPOINTMENT OF SETTLEMENT
ADMINISTRATOR; APPROVAL OF CLASS NOTICE PACKET; AND SETTING OF
FINAL APPROVAL HEARING**

on the parties to this action as follows:

Attorney	Party(ies) Served	Method of Service
Michael Holecek Jun Nam Alexa Yarnell Gibson, Dunn & Crutcher LLP 333 South Grand Ave. Los Angeles, CA 90071-3197 Tel: (213) 229-7018 mholecek@gibsondunn.com JNam@gibsondunn.com ayarnell@gibsondunn.com	Attorneys for Default Defendant/Non- Party HUNGRYPANDA US INC.	By Electronic Service



[BY ELECTRONIC SERVICE] I hereby certify that the above-referenced document(s) were served electronically on the parties listed herein at their most recent known email address or email of record at mholecek@gibsondunn.com, JNam@gibsondunn.com and ayarnell@gibsondunn.com.



[BY HAND] I directed the sealed envelope(s) to the party(ies) so designated on the service list to be delivered by Ace Attorney Service, Inc. this date.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that this declaration was executed on July 10, 2024, at Long Beach, California.



Linda Montemayor