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Attorneys for Plaintiff Ronghui Lee
on behalf of himself and all others
similarly situated and all other aggrieved
employees

**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
) AND MOTION FOR FINAL APPROVAL
) OF CLASS ACTION SETTLEMENT AND
) AWARD FOR ATTORNEYS' FEES,
) COSTS, AND CLASS REPRESENTATIVE
) ENHANCEMENT**

) Date: February 20, 2025

) Time: 8:30 a.m.

) Judge: Hon. Christian Towns

) Dept.: S-26

) Action Filed: September 2, 2021

) Trial Date: None

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

2 PLEASE TAKE NOTICE that on February 20, 2025, at 8:30 a.m. or as soon thereafter as
3 counsel may be heard, in Department S-26 of this Court, located at 247 W. 3rd St., San Bernardino,
4 CA 92415-0210, before the Honorable Christian Towns, plaintiff Ronghui Lee ("Plaintiff") will
5 and does hereby move the Court for an order granting final approval of the class action settlement
6 (the "Settlement"), an award of a class representative enhancement for Plaintiff, and an award of
7 reasonable attorneys' fees and costs for Class Counsel.

8 The motion is made on the grounds that the Settlement, which was reached after arms'
9 length negotiations by counsel for the parties, is fair and reasonable, has drawn a favorable
10 response from the Class with no objections, and should be given final approval by the Court for all
11 the reasons set forth in the accompanying memorandum in support of the motion.

12 This motion is based on this notice, the accompanying memorandum in support of the
13 motion, the declaration of Makenna Snow for ILYM Group, Inc. in support of the motion; the
14 declarations of Joseph R. Becerra and Torey Joseph Favarote in support of the motion; the
15 declaration of class representative Ronghui Lee; Plaintiff's Motion for Final Approval of Class
16 Action Settlement; the declarations of Joseph R. Becerra and Torey Joseph Favarote in support of
17 the Motion for Final Approval of Class Action Settlement and all matters of which the Court may
18 take notice, and any oral or documentary evidence presented at the hearing on the motion.

19 Dated: January 24, 2025

BECERRA LAW FIRM
JOSEPH R. BECERRA

20
21 By: _____

Joseph R. Becerra

22 Attorneys for Plaintiff Ronghui Lee, on
23 behalf of himself and all others similarly
situated

24 Dated: January 24, 2025

GLEASON & FAVAROTE, LLP
TOREY JOSEPH FAVAROTE
DAVID H. DANNING

25
26 By: _____

Torey Joseph Favarote

27 Attorneys for Plaintiff Ronghui Lee, on
28 behalf of himself and all others similarly
situated

1 **PROOF OF SERVICE**

2 I, Thomas Steinhart, declare:

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

7 On January 24, 2025, I served a copy(ies) of the following document(s):

8 **PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF**
9 **CLASS ACTION SETTLEMENT AND AWARD FOR ATTORNEYS' FEES, COSTS, AND**
10 **CLASS REPRESENTATIVE ENHANCEMENT**

11 on the parties to this action as follows:

12 Attorney	13 Party(ies) Served	14 Method of Service
15 GIBSON, DUNN & CRUTCHER LLP 16 Michael Holecek 17 Arthur Halliday 18 Alexa L. Yarnell 19 333 South Grand Avenue 20 Los Angeles, California 90071 21 Telephone: 213.229.7000 22 Facsimile: 213.229.7520 23 MHolecek@gibsondunn.com 24 AHalliday@gibsondunn.com 25 AYarnell@gibsondunn.com	26 Attorneys for 27 Default 28 Defendant/Non- Party HUNGRYPANDA US INC.	By Email

29 ☒ [BY ELECTRONIC TRANSMISSION] I caused said document to be sent by electronic
30 transmission to the e-mail address indicated for the party(ies) listed above.

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

33 I declare under penalty of perjury under the laws of the State of California that the above is
34 true and correct, and that this declaration was executed on January 24, 2025, at Long Beach,
35 California.

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