

JULIAN HAMMOND (SBN 268489)
jhammond@hammondlawpc.com
POLINA BRANDLER (SBN 269086)
pbrandler@hammondlawpc.com
ARI CHERNIAK (SBN 290071)
acherniak@hammondlawpc.com
HAMMONDLAW, P.C.
1201 Pacific Ave., 6th Floor
Tacoma, WA 98402
Tel.: (310) 601-6766
Fax: (310) 295-2385

WILLIAM C. JHAVERI-WEEKS (SBN 289984)
wjw@jhaveriweeks.com
SARAH ABRAHAM (SBN 326098)
sa@jhaveriweeks.com
ALLY N. GIROUARD (SBN 336625)
ag@jhaveriweeks.com
THE JHAVERI-WEEKS FIRM, P.C.
351 California Street, Suite 700
San Francisco, CA 94104
Tel.: (415) 463-8097
Fax: (415) 367-1439

Attorneys for Plaintiff and the Putative Class

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

CHAD HARRIS, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

**SOUTHERN NEW HAMPSHIRE
UNIVERSITY**, a New-Hampshire Non-Profit
Corporation,

Defendant.

Case No. RG21109745

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

ASSIGNED FOR ALL PURPOSES TO
JUDGE EVELIO GRILLO
DEPARTMENT 21

Date: November 15, 2022

Time: 10:00 a.m.

Reservation No.: 818792676239

Action Filed: August 18, 2021

Trial Date: None Set

1 NOTICE IS HEREBY GIVEN that, on November 15, 2022 at 10:00 a.m., or as soon thereafter
2 as the matter may be heard, Plaintiff Chad Harris will and hereby does move for entry of the proposed
3 Order filed herewith (1) granting certification of the proposed settlement class; (2) granting preliminary
4 approval of the Parties' class action settlement; (3) ordering the proposed Class Notice to be sent to the
5 settlement class; (4) preliminarily approving Class Counsel's requested attorneys' fees and costs and the
6 Class Representative's requested Enhancement; and (5) setting a date and time for a Final Approval
7 Hearing.

8 This Motion is based upon this Notice of Motion; the Memorandum of Points and Authorities in
9 Support hereof; the Declarations of Proposed Class Counsel William C. Jhaveri-Weeks and Julian
10 Hammond in Support of the Motion; the Declaration of Defense Counsel R. Brian Dixon in Support of
11 Tax Allocation of Settlement Proceeds; the Declaration of Jodey Lawrence on behalf of Proposed
12 Settlement Administrator Phoenix Settlement Administrators; the Proposed Order; the pleadings and
13 prior filings in this case; and such other documentary and oral evidence or argument as may be
14 presented to the Court at the hearing on this Motion.

15 Dated: October 19, 2022

Respectfully submitted,

17 THE JHAVERI-WEEKS FIRM, P.C.

19 

20 William C. Jhaveri-Weeks

21 Sarah Abraham

22 *Attorneys for Plaintiff and the Putative Class*



Superior Court of Alameda County Public Portal

Make a Reservation

Harris VS Southern New Hampshire University,

Case Number: RG21109745 Case Type: Unlimited Civil Category: Other Employment Complaint Case

Date Filed: 2021-08-18 Location: Rene C. Davidson Courthouse - Department 21

Reservation

Case Name: Harris VS Southern New Hampshire University,	Case Number: RG21109745
Type: Motion for Order (Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement)	Status: RESERVED
Filing Party: Chad Harris (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 21
Date/Time: 11/15/2022 10:00 AM	Number of Motions: 1
Reservation ID: 818792676239	Confirmation Code: CR-DMKVUAFUVM BAYEYZP

Fees

Description	Fee	Qty	Amount
Motion for Order (name extension)	0.00	1	0.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount:

\$1.00

Type:

Visa

Account Number:

XXXX7596

Authorization:

04772D

Payment Date:

1969-12-31

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