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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

JULIA DOWNS et. al., , individually, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

GUARANTEED RATE, INC. and DOES 1
through 50, inclusive

Defendants.

Case No.: 21CV003476

Assigned to: Hon. Karin Schwartz
Dept: 20

**PLAINTIFFS' NOTICE OF
MOTION FOR APPROVAL OF
PAGA SETTLEMENT AND ENTRY OF
JUDGMENT**

Hearing Date: August 6, 2025
Time: 3:00 p.m.
Judge: Hon. Karin Schwartz
Location: Dept. 20

Reservation ID: 892095076853

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD HEREIN:**

2 **PLEASE TAKE NOTICE** that on August 6, 2025 at 3:00 p.m. in Department 20 of the
3 Superior Court of the County of Alameda, located at 1225 Fallon Street., Oakland, CA 94612, or
4 as soon thereafter as the matter may be heard, Plaintiffs, JULIA DOWNS and JOSE
5 MAGALLANES (“Plaintiffs”) will, and hereby do, move for an order granting approval of
6 settlement and entry of judgment of the claims alleged in the *Downs, et al. v. Guaranteed Rate,*
7 *Inc.* Action Case No. 21CV003476.
8

9 This motion is made pursuant to this notice, the attached Memorandum of Points and
10 Authorities, the Declarations of John Glugoski and Tae Kim attached hereto, including exhibits,
11 the oral arguments to be presented at the hearing of this motion, and all other documents and
12 pleadings currently on file with this Court.
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14 Dated: July 14, 2025

Respectfully submitted,

15 **RIGHETTI GLUGOSKI, P.C.**
16 **COLLINS KIM**

17 By: /s/ John Glugoski
18 John Glugoski, Esq.
19 Attorneys for Plaintiffs Julia Downs, et al.
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