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Attorneys for Plaintiff MARA SANTAMARIA,
individually and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

MARA SANTAMARIA, and on behalf of
all others similarly situated,

Plaintiffs,

v.

BRIGHT HORIZONS CHILDREN'S
CENTER, a Delaware Corporation;
BRIGHT HORIZONS FAMILY
SOLUTIONS INC., a Delaware
Corporation, and DOES 1-10, inclusive,

Defendants.

Case No.: CIVSB2210140

CLASS ACTION AND PAGA
REPRESENTATIVE ACTION

Assigned For All Purposes To:
Judge: Joseph T. Ortiz
Dept.: S17

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

Date: May 23, 2023
Time: 1:30 p.m.
Dept.: S17

Action Filed: May 17, 2022

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on May 23, 2023 at 1:30 p.m. in Department S17 of the
3 Superior Court of the State of California, County of San Bernardino located at 247 West Third
4 Street, San Bernardino, California 92415-0210, or as soon thereafter as this matter can be heard,
5 Plaintiff Mara Santamaria (“Plaintiff”) will and hereby does move this Court for an order granting
6 final approval of the terms of the Stipulation of Settlement and Release (the “Settlement
7 Agreement”) by and between Plaintiff, on behalf of herself and the conditionally certified
8 Settlement Class, and Defendants Bright Horizons Family Solutions Inc. and Bright Horizons
9 Children’s Centers LLC (collectively, “Defendants”).

10 Plaintiff respectfully requests that the Court (1) finally approve the settlement as fair,
11 adequate, and reasonable; (2) certify the Settlement Class for settlement purposes; (3) grant the
12 requested settlement administration expenses to ILYM Group, Inc.; and (4) enter final judgment
13 substantially in the form of the proposed order submitted herewith.

14 The Settlement has been successfully administered, and good cause exists for granting the
15 Motion and finding the Settlement and settlement administration expenses to be fair, reasonable,
16 and appropriate.

17 PLEASE TAKE FURTHER NOTICE that Plaintiffs will also and hereby do move this
18 Court for an order awarding (a) Class Counsel’s attorneys’ fee in the amount of \$833,333.33 and
19 litigation costs of \$19,495.68; and (b) a service award in the amount of \$10,000 to Plaintiff
20 Santamaria as Class Representative.

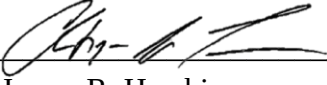
21 This motion is brought pursuant to California Rule of Court 3.769 and California Code of
22 Civil Procedure section 382, and is based on this Notice of Motion and Motion; the Memorandum
23 of Points and Authorities in support of the Motion; the Declaration of James R. Hawkins; the
24 Declaration of Plaintiff Mara Santamaria; the Declaration of Madely Nava on behalf of ILYM
25 Group, Inc.; the Proposed Order Granting Final Approval of Class Action Settlement and
26 Judgement; all documents currently on file in this action including without limitation those
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1 submitted in support of preliminary approval; the arguments of counsel; and such other and
2 further evidence as the Court may choose to entertain.

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4 Dated:

Respectfully Submitted:

5 James Hawkins, APLC

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7 By:  _____

8 James R. Hawkins

Christina M. Lucio

9 Mitchell J. Murray

10 Attorneys for Plaintiff Mara Santamaria
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