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Attorneys for Plaintiffs PRISCILLA AGUILAR, JULIAN HARO, JUAN MADERA, and
RICHARD NUNEZ on behalf of themselves and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

PRISCILLA AGUILAR, JULIAN HARO,
JUAN MADERA, and RICHARD NUNEZ, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

OWENS-BROCKWAY GLASS CONTAINER,
INC., a Delaware Corporation, and DOES 1-50,
inclusive,

Defendants.

Case No. 21STCV33017

Assigned for All Purposes:
Hon. Yvette M. Palazuelos

**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

Hearing Information
Date: August 24, 2023
Time: 10:00 a.m.
Dept: 9

Complaint Filed: September 8, 2021
Trial Date: None set

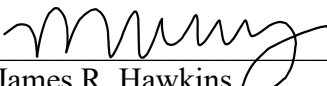
1 **TO THE COURT, DEFENDANTS, AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on August 24, 2023 at 10:00 a.m. in Department 9 of the
3 Superior Court of California, County of Los Angeles, located at 312 North Spring Street
4 Los Angeles, CA 90012, Plaintiffs Priscilla Aguilar, Julian Haro, Juan Madera, and Richard Nunez
5 (“Plaintiffs”) will, and hereby moves this Court, pursuant to California Code of Civil Procedure
6 section 382 and California Labor Code 2699(a)(2), for entry of the proposed Order submitted
7 herewith: (1) granting preliminary approval of the Stipulation of Class Action Settlement (the
8 “Settlement Agreement”) executed by the Parties; (2) provisionally certifying the Class for
9 settlement purposes only; (3) appointing Plaintiffs as Class Representatives, James Hawkins APLC
10 as Class Counsel, and CPT Group, Inc. as Settlement Administrator; (4) approving the form and
11 content of the Notice of Class Action Settlement (the “Settlement Notice”); (5) directing
12 distribution of the Settlement Notice to the Class; and (6) setting a hearing for final approval of the
13 Settlement.

14 This motion is made pursuant to California Code of Civil Procedure section 382, California
15 Labor Coode section 2699(a)(2), California Rules of Court, Rules 3.764, 3.766 and 3.769, on the
16 grounds that Plaintiffs and Defendant Owens-Brockway Glass Container, Inc. (“Defendant”) have
17 reached a class and representative action settlement and now seek preliminary approval from this
18 Court. This motion is supported by Plaintiffs’ Memorandum of Points and Authorities and the
19 declaration of James R. Hawkins and the exhibits attached thereto; all filed concurrently herewith,
20 and by all other evidence and arguments as may be presented to this Court either prior to or at the
21 hearing on this matter, and such matters as the Court may consider.

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23 Dated: April 28, 2023

JAMES HAWKINS APLC

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26 James R. Hawkins
Christina M. Lucio
Mitchell J. Murray

27 Attorneys for Plaintiffs and the Proposed Class
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