

Janelle Carney, Esq. (Bar No. 201570)
JANELLE CARNEY – ATTORNEY AT LAW, APC
14758 Pipeline Ave., Suite E, 2nd Floor
Chino Hills, CA 91709
Tel.: (909) 521-9609 / Fax: (909) 393-0471
Email: Janelle@JanelleCarneyLaw.com

Manny Starr (319778)
Manny@frontierlawcenter.com
Adam Rose, Esq. (Bar No. 210880)
ada@frontierlawcenter.com
FRONTIER LAW CENTER
23901 Calabasas Road, #2074
Calabasas, CA 91302
Telephone: (818) 914-3433/ Facsimile: (818) 914-3433

Attorneys for Plaintiff, Lupe Morales

Justin F. Marquez (SBN 262417)
justin@wilshirelawfirm.com
Christina M. Le (SBN 237697)
cle@wilshirelawfirm.com
Zachary D. Greenberg (SBN 237697)
zgreenberg@wilshirelawfirm.com
WILSHIRE LAW FIRM
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone: (213) 381-9988/ Facsimile: (213) 381-9989

Attorneys for Plaintiffs, Erika Muniz and Blanca Navarro

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

Coordination Proceeding
Special Title (Rule 3.550)

**SUNSHINE RETIREMENT WAGE AND
HOUR CASES**

) JCCP No. 5247
) Hon. Lauri A. Damrell
) Dept. 28
)
) **NOTICE OF PLAINTIFFS' MOTION**
) **FOR FINAL APPROVAL OF CLASS**
) **ACTION AND PAGA SETTLEMENT**
)
) Date: January 19, 2024
) Time: 9:00 a.m.
) Dept.: 28
)
) Action filed: September 22, 2021
)
)

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

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on January 19, 2024, at 10:00 a.m., or soon thereafter as the
3 matter may be heard by the Honorable Lauri A. Damrell in Department 28 of the Sacramento
4 County Superior Court, located at 720 Ninth Street, Sacramento, CA, Plaintiffs, Lupe Morales,
5 Erika Muniz, and Blanca Navarro, will move for an order granting Plaintiffs' Motion for Final
6 Approval of Class Action and PAGA Settlement. Furthermore, Plaintiffs will move for an Order
7 Granting Plaintiffs' Motion for Attorneys' Fees, Costs, and Class Representatives Enhancements,
8 per the papers filed concurrently herewith. Good cause exists for the granting both Motions in that
9 the terms of the settlement, including the requested Class Representative Enhancement, Attorneys'
10 Fees, Costs are fair, reasonable, and adequate, and that the requested fees, costs, and enhancements
11 have been preliminarily approved by this Court on November 1, 2023, and the requested amounts
12 are fair, reasonable, and adequate pursuant to the terms of the settlement agreement. The
13 Defendant does not oppose these motions.

14 This Motion will be based on this Notice of Motion; the Declarations of Janelle Carney,
15 Adam Rose, Justin Marquez, and Christina Fowler of ILYM Group, Inc.¹, the Memorandum of
16 Points and Authorities, and on such oral and documentary evidence as may be presented at the
17 hearing on the Motion.

18 Dated: December 26, 2023

JANELLE CARNEY – ATTORNEY AT LAW, APC
FRONTIER LAW CENTER
WILSHIRE LAW FIRM



22 By:

Janelle Carney,
Attorneys for Plaintiff, Lupe Morales, Erika Muniz and
Blanca Navarro

27 ¹ The Declaration of ILYM Group will be filed on or before January 5, 2024, given the opt-out deadline of January 2,
28 2024.