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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 PLAINTIFF'S MOTION**
) **FOR PRELIMINARY APPROVAL OF**
) **CLASS ACTION AND PAGA**
) **SETTLEMENT**
)
) Date: October 6, 2023
) Time: 9:00 a.m.
) Dept.: 28
)
) Action filed: September 22, 2021
)

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

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

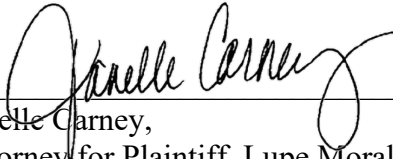
2 PLEASE TAKE NOTICE that on October 6, 2023, at 9:00 a.m., or as soon thereafter as the
3 matter may be heard by the Honorable Lauri A. Damrell in Department 28 of the Sacramento
4 Superior Court located at 720 Ninth Street, Sacramento, CA 95814-1380, Plaintiffs Lupe Morales,
5 Erika Muniz, and Blanca Navarro, will move for an order granting conditional certification and
6 preliminary approval of the class action and PAGA settlement. Good cause exists for the granting
7 of the Motion in that the proposed settlement is fair, reasonable and adequate.

8 The Motion will be based on this Notice of Motion, the Declarations of Janelle Carney,
9 Manny Starr, Christina Le, Rory Massey, Lupe Morales, Erika Muniz, and Blanca Navarro; the
10 Memorandum of Points and Authorities, and on such oral and documentary evidence as may be
11 presented at the hearing on the Motion.

12 Dated: September 13, 2023

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14
15 By:



Janelle Carney,
Attorney for Plaintiff, Lupe Morales