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Attorneys for Plaintiff Thomas Beltran,
individually and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

THOMAS BELTRAN, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

GEORGE CHIALA FARMS, INC.; and DOES
1 through 20, inclusive,

Defendants.

Case No. 21CV387958

Assigned for all purposes to:
Hon. Theodore C. Zayner
Dept. 19

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

Date: July 26, 2023
Time: 1:30 p.m.
Dept: 19

TO ALL INTERESTED PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on July 26, 2023 at 1:30 p.m., or as soon thereafter as the matter may be heard in Department 19 of the above-entitled Court located at 191 North First Street, San Jose, California 95113, Plaintiff Thomas Beltran (“Plaintiff”) will and hereby do move this Court for an Order:

1. Granting preliminary approval of the proposed Joint Stipulation of Settlement (“Settlement Agreement” or “Agreement”);
2. Conditionally certifying the proposed Class for settlement purposes only;
3. Appointing Plaintiff Thomas Beltran as the Class Representative;
4. Appointing Aegis Law Firm, PC as Class Counsel;
5. Appointing CPT Group as the Settlement Administrator and authorizing CPT Group to send notice of the Settlement to the Class Members; and
6. Setting a final approval hearing date.

Pursuant to California Rules of Court 3.769(d) and (e), the Motion is made on the grounds that the proposed Settlement Agreement satisfies all criteria for preliminary approval under California law and falls well within the range of reasonableness; the Agreement was reached through informed, arms-length bargaining between experienced attorneys, and Plaintiff and Class Counsel will fairly and adequately represent the Class Members.

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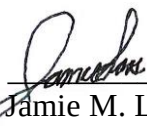
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1 The Motion is based on this Notice of Motion, Plaintiff's Motion for Preliminary Approval of
2 Class Action Settlement, the Declaration of Alexander G.L. Davies, the Declaration of Thomas Beltran,
3 and on all records and documents on file, together with such oral and documentary evidence that may
4 be presented at the hearing on this matter.

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6 Dated: June 29, 2023

AEGIS LAW FIRM, PC

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8 By:  _____
9 Jamie M. Loos
10 Attorneys for Plaintiff
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