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Attorneys for Plaintiff ANTOINE BRESSE
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

ANTOINE BRESSE, individually and on
behalf of himself and all others similarly
situated,

Plaintiff,

v.

INFINITE COMPUTER SOLUTIONS,
INC., a Delaware Corporation; and DOES
1-50, inclusive,

Defendants.

Case No. 30-2022-01243447-CU-OE-CXC

CLASS ACTION

Assigned for All Purposes To:
Hon. Melissa McCormick
Dept.: CX-104

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

Date: November 07, 2024
Time: 2:00p.m.
Dept: CX104
Trial: Not Set

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD HEREIN:**

2 **PLEASE TAKE NOTICE** that on November 07, 2024, at 2:00p.m., or as soon thereafter
3 as counsel may be heard, in Department CX104 of the above-captioned court, located at 751 W.
4 Santa Ana Blvd., Santa Ana, CA 92701, the Honorable Melissa McCormick presiding, Plaintiff
5 Antoine Bresse, on behalf of himself and all others similarly situated, moves this Court to: (1)
6 preliminarily approve the settlement set forth in the Class Action and PAGA Settlement
7 Agreement, attached as Exhibit 1 to the Declaration of James Hawkins; (2) conditionally certify
8 the proposed Settlement Class; (3) appoint Antoine Bresse as the Class Representative; (4)
9 appoint James Hawkins APLC as Class Counsel; (5) approve distribution of the proposed Notice
10 of Class Action Settlement to the Class Members; (6) appoint Phoenix Class Action
11 Administration Solutions as the Settlement Administrator; and (7) set a hearing date for final
12 approval of the settlement.

13 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum
14 of Points and Authorities in support of Motion for Preliminary Approval of Class Action and
15 PAGA Settlement; (3) the Declarations of James Hawkins and Antoine Bresse; (4) the Class
16 Action and PAGA Settlement Agreement; (5) the Notice of Class Action Settlement; (6) the
17 [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement; (7) the
18 records, pleadings, and papers filed in this action; and (8) upon such other documentary and oral
19 evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.
20 As this Motion is unopposed, the Parties respectfully request relief from the page limit
21 requirement set by California Rules of Court, Rule 3.1113(d).

22 Dated: July 15, 2024

Respectfully submitted,

23 **JAMES HAWKINS APLC**

24 By: _____

25 James Hawkins
26 Christina Lucio
Eric D. Tims

27 Attorneys for Plaintiff Antoine Bresse, on behalf of
28 himself and all others similarly situate

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PROOF OF SERVICE, COUNTY OF ORANGE

I am a resident of the State of California, County of Orange. I am over the age of eighteen years and not a party to the within action. My business address is 9880 Research Drive., Suite 200, Irvine, California 92618.

On July 15, 2024, I served on the interested parties in this action the following document(s) entitled:

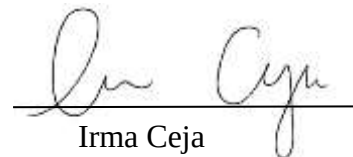
-NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PAGA SETTLEMENT AGREEMENT
-MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PAGA SETTLEMENT AGREEMENT
-DECLARATION OF JAMES HAWKINS IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PAGA SETTLEMENT AGREEMENT
-DECLARATION OF ANTOINE BRESSE IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PAGA SETTLEMENT AGREEMENT
-[PROPOSED] ORDER FOR MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PAGA SETTLEMENT AGREEMENT

[XX] BY ELECTRONIC SERVICE: Based on a court Order or an agreement by the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from the email address irma@jameshawkinsaplc.com to the persons at the e-mail addresses listed in the Service List below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

SERVICE LIST
PLEASE SEE PAGE ATTACHED

[X] STATE: I declare under penalty of perjury, under the laws of the State of California, that the above is true and correct.

Executed on July 15, 2024, at Irvine, California.


Irma Ceja

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<http://www.dir.ca.gov/Private-Attorneys-General-Act>