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Attorneys for Plaintiff Noreen Mendoza, individually, and
on behalf of all others similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

NOREEN MENDOZA, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

PROPERTYRATE, LLC; and DOES 1 through
20, inclusive,

Defendants.

Case No. 30-2021-01233226-CU-OE-CXC

Assigned for all purposes to:

Hon. William D. Claster, Dept.: CX101

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

Date: December 29, 2023

Time: 9:00 a.m.

Dept: CX101

Reservation: 74146751

**TO THE COURT, ALL INTERESTED PARTIES, AND THEIR RESPECTIVE ATTORNEYS
OF RECORD:**

PLEASE TAKE NOTICE that on December 29, 2023 at 9:00 a.m., or as soon thereafter as the matter may be heard in Department CX101 of the above-entitled Court located at 751 W. Santa Ana Blvd., Santa Ana, CA 92701, Plaintiff Noreen Mendoza (“Plaintiff”) will and hereby do move this Court for an Order:

1. Granting preliminary approval of the proposed CLASS ACTION AND PAGA SETTLEMENT AGREEMENT AND CLASS NOTICE (“Settlement Agreement” or “Agreement”);
2. Conditionally certifying the proposed Class for settlement purposes only;
3. Appointing Plaintiff Noreen Mendoza as the Class Representative;
4. Appointing Aegis Law Firm, PC as Class Counsel;
5. Appointing ILYM Group, Inc. as the Settlement Administrator and authorizing ILYM Group, Inc. 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.

The Motion is based on this Notice of Motion, Plaintiff’s Memorandum of Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement, the Declaration of Jessica L. Campbell, the Declaration of Noreen Mendoza, the Declaration of Brian Cole II, the Declaration of Dexter Go, and on all records and documents on file, together with such oral and documentary evidence that may be presented at the hearing on this matter.

1 Dated: November 13, 2023

AEGIS LAW FIRM, PC

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3 By: /s/ Jessica L. Campbell
4 Jessica L. Campbell
5 Attorneys for Plaintiff
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