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Attorneys for Plaintiff Anna Hernandez

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

ANNA HERNANDEZ, individually and as an
aggrieved employee pursuant to the Private
Attorneys General Act ("PAGA"), and on
behalf of the State of California and other
aggrieved employees,

Plaintiff.

vs.

OLD NAVY, LLC, a Delaware Limited
Liability Company.

Defendant.

CASE NO.: CGC-22-598893

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION FOR SETTLEMENT
APPROVAL, APPROVAL OF
ATTORNEYS' FEES, COSTS, AND
INCENTIVE AWARD**

Date: January 30, 2024

Time: 9:30 a.m.

Dept.: 302 (Law and Motion)

Judge: Hon. Richard B. Ulmer

Complaint Filed: March 25, 2022

1 **TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

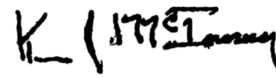
2 PLEASE TAKE NOTICE that on January 30, 2024, at 9:30 a.m. in Department 302 of
3 the above captioned court, located at 400 McAllister Street, San Francisco, California 94102,
4 Plaintiff will move the Honorable Richard B. Ulmer Jr. for orders granting Plaintiff's Motion for
5 Settlement Approval, and Motion for Approval of Attorneys' Fees, Costs, and Incentive Award
6 to the Plaintiff, as set forth below.

7 Plaintiff, Anna Hernandez, hereby moves for an order approving the proposed settlement
8 with Defendant, Old Navy, LLC. This motion is based upon the Declaration of Kevin J.
9 McInerney, which attaches the Proposed Settlement Agreement, and the Declaration of Raul
10 Perez, Esq. It is also based upon the attached Memorandum of Points and Authorities in Support
11 of Settlement Approval.

12 Simultaneously, the Plaintiff moves for an award of reasonable attorney's fees and
13 litigation costs. This is based upon the files and records of this case and the attached Declarations
14 of Kevin J. McInerney and Raul Perez, Esq. Finally, the Plaintiff moves for an incentive award
15 in the amount of \$25,000. This is based upon the attached Declarations, Memoranda of Points
16 and Authorities, and the Declaration of Anna Hernandez.

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18 Dated: January 4, 2024

Respectfully submitted,

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21 Kevin J. McInerney
22 Attorney for Plaintiff Anna Hernandez
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