

1 Janelle Carney (201570)
2 janelle@janellecarneylaw.com
3 **JANELLE CARNEY- ATTORNEY AT LAW, APC**
4 14758 Pipeline Ave., Suite E
5 Chino Hills, CA 91709-6025
6 Tel.: (909) 393-0223 / Fax: (909) 393-0471

7 Manny Star (319778)
8 manny@frontierlawcenter.com
9 Adam Rose (210880)
10 adam@frontierlawcenter.com
11 **FRONTIER LAW CENTER**
12 23901 Calabasas Rd., #2074
13 Calabasas, CA 91302
14 Tel.: (818) 914-3433 / Fax (818) 914-3433

15 Attorneys for Plaintiff, Noe Ponce Ceja

16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

NOE PONCE CEJA, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

VENTURE DYNAMICS ENTERPRISES,
INC. and DOES 1 to 100,

Defendants.

Case No. 37-2022-00004908-CU-OE-CTL
Hon. Katherine Bacal
Dept. C-69

**NOTICE OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE
ENHANCEMENT**

Date: March 15, 2024
Time: 1:30 p.m.
Dept.: C-69

Action filed: February 7, 2022

**NOTICE OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, ATTORNEYS' FEES, COSTS, AND CLASS REPRESENTATIVE
ENHANCEMENT**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on March 15, 2024, at 1:30 p.m., or soon thereafter as the
3 matter may be heard by the Honorable Katherine Bacal in Department C-69 of the San Diego
4 Superior Court, located at 330 W. Broadway, San Diego, CA 92101-3827, Plaintiff Noe Ponce
5 Ceja, will move for an order granting Plaintiff's Motion for Final Approval of Class Action and
6 PAGA Settlement, Attorneys' Fees, Costs, and Class Representatives Enhancement. Good cause
7 exists for the granting of this Motion in that the terms of the settlement, including the requested
8 Class Representative Enhancement, Attorneys' Fees, Costs are fair, reasonable, and adequate,
9 and that the requested fees, costs, and enhancements have been preliminarily approved by this
10 Court on October 6, 2023, and the requested amounts are fair, reasonable, and adequate pursuant
11 to the terms of the settlement agreement. The Defendant does not oppose this motion.

12 This Motion will be based on this Notice of Motion; the Supplemental Declarations of
13 Janelle Carney, Adam Rose, and Noe Ponce Ceja, as well as the Declaration of Abigail Schwartz
14 of Rust Consulting, Inc., the Memorandum of Points and Authorities, and on such oral and
15 documentary evidence as may be presented at the hearing on the Motions.

16 Dated: February 22, 2024 JANELLE CARNEY – ATTORNEY AT LAW, APC
17 FRONTIER LAW CENTER

18 By:

19 
Janelle Carney,
Attorneys for Plaintiff