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8 Ramirez and Brad Smith

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10 **SUPERIOR COURT OF CALIFORNIA**
11 **COUNTY OF SACRAMENTO**
12

13 JARED DEEVER, as an individual and on
14 behalf of all others similarly situated,

15 Plaintiffs,

16 v.

17 BLUE DIAMOND GROWERS, a California
corporation; et al,

18 Defendants.

19 AND RELATED CONSOLIDATED CASES.
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Case No. 34-2022-00316490-CU-OE-GDS
(Consolidated with Case Nos. 34-2022-
00319378-CU-OE-GDS and 34-2021-
00304425-CU-OE-GDS)

Assigned to Hon. Lauri A. Damrell, Dept. 22

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

Date: January 31, 2025
Time: 9:00 a.m.
Dept.: 22

Reservation No.: A-316490-001

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1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on January 31, 2025, at 9:00 a.m., in Department 22 of the
3 above-captioned Court, located at 720 9th Street, Sacramento, California, plaintiffs Jared Deaver,
4 Brad Smith, and Daniel Ramirez will move the Court for preliminary approval of a proposed class
5 action settlement in the above-captioned action under Cal. Rule of Court 3.769. The terms of the
6 settlement are contained within the Settlement Agreement and Release (the "Settlement
7 Agreement"), filed concurrently herewith as Exhibit 1 to the Declaration of Chad Saunders. In
8 addition, Plaintiffs request that the Court certify the class described in the Settlement Agreement;
9 approve the form of class notice, attached as Exhibit A to the Settlement Agreement; approve
10 Crosner Legal P.C., Bibiyan Law Group, P.C., Diversity Law Group, P.C., Polaris Law Group, and
11 Law Offices of Choi & Associates as Class Counsel, approve plaintiffs Jared Deaver, Brad Smith,
12 and Daniel Ramirez as the Class Representatives, approve Phoenix Settlement Administrators as
13 the Settlement Administrator, and set a final approval hearing for June 20, 2025, or the first available
14 date on the Court's calendar thereafter.

15 This motion will be based on this Notice of Motion and Motion, the accompanying
16 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying Declarations
17 of Chad Saunders, David Bibiyan, Larry W. Lee, Christine Lee, William L. Marder, Edward W.
18 Choi, Jared Deaver, Brad Smith, Daniel Ramirez, and Jodey Lawrence, the Court's entire file herein,
19 and on such further evidence and argument as may be presented at the hearing.

20 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this
21 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings for
22 the department may be downloaded off the court's website. If the party does not have online access,
23 they may call the dedicated phone number for the department as referenced in the local telephone
24 directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the hearing and
25 receive the tentative ruling. If you do not call the court and the opposing party by 4:00 p.m. the court
26 day before the hearing, no hearing will be held.

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DATED: January 8, 2025

CROSNER LEGAL, P.C.
BIBIYAN LAW GROUP, P.C.
DIVERSITY LAW GROUP, P.C.
POLARIS LAW GROUP
LAW OFFICES OF CHOI & ASSOCIATES

By: 
Chad Saunders
Attorneys for Plaintiffs