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17 Attorneys for Plaintiff, Samuel Nudelman

18  
19 SUPERIOR COURT OF CALIFORNIA

20 COUNTY OF SAN JOAQUIN

21 SAMUEL NUDELMAN, on behalf of himself  
22 and all others similarly situated and the general  
23 public,

24 Plaintiff,

25 v.

26 HEARTLAND STEEL PRODUCTS WEST  
27 LLC, a California Limited Liability Company  
28 and DOES 1 to 100,

Defendants.

) CASE NO. STK-CV-UOE-2022-0003348  
) Hon. Jayne Lee  
) Dept. 10C  
)  
) CLASS ACTION  
)  
) NOTICE OF PLAINTIFF'S MOTION  
) FOR PRELIMINARY APPROVAL OF  
) CLASS ACTION AND PAGA  
) SETTLEMENT  
)  
) Date: TBD  
) Time: 9:00 AM  
) Dept.: 10C  
)  
) Action filed: May 4, 2022  
)  
)

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

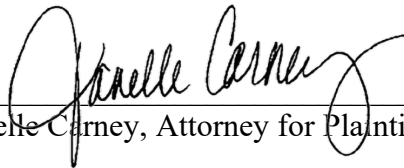
2 PLEASE TAKE NOTICE that on a date to be determined in 2023, at 9:00 a.m., or as soon  
3 thereafter as the matter may be heard by the Honorable Jayne Lee in Department 10C of the San  
4 Joaquin County Superior Court, located at 180 E Weber Ave., Suite 200, Stockton, CA 95202,  
5 Plaintiff Samuel Nudelman will move for an order granting conditional certification and  
6 preliminary approval of the class action and PAGA settlement. Good cause exists for the granting  
7 of the Motion in that the proposed settlement is fair, reasonable and adequate.

8 The Motion will be based on this Notice of Motion, the Declarations of Janelle Carney,  
9 Theodore Tang, and Samuel Nudelman; the Memorandum of Points and Authorities, and on such  
10 oral and documentary evidence as may be presented at the hearing on the Motion.

11 Dated: September 15, 2023

JANELLE CARNEY – ATTORNEY AT LAW, APC  
FRONTIER LAW CENTER

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13  
14 By:

  
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Janelle Carney, Attorney for Plaintiff