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9 (additional counsel listed on following page)

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SAN BERNARDINO**

12 ANGEL ARMENTA and JAKKOB
13 ROMERO, individually, on behalf of all
14 others similarly situated, and on behalf of
15 the State of California and other aggrieved
persons,

16 Plaintiffs,

17 v.

18 BLUE BEACON INTERNATIONAL,
19 INCORPORATED, a corporation; BLUE
20 BEACON U.S.A., L.P., a limited
21 partnership; BLUE BEACON U.S.A. II,
L.P., a limited partnership; and DOES 1
through 10, inclusive,

22 Defendants.
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Case No.: CIVSB2206415

Assigned for All Purposes to:
Hon. Jessica Morgan
Dept. S-26

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND REQUEST FOR
ATTORNEY'S FEES AND COSTS**

[Filed concurrently with Memorandum of Points
and Authorities; Declarations of Jamie K. Serb,
Justin F. Marquez, and Markus Balthuis;
[Proposed] Order]

Date: October 4, 2023
Time: 9:00 a.m.
Dept. S-26

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1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

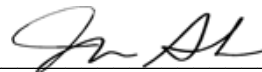
2 PLEASE TAKE NOTICE that on October 4, 2023, at 9:00 a.m., or as soon thereafter as
3 the matter may be heard, in Department S-26 of the above-captioned Court, located at 247 West
4 Third Street, San Bernardino, California, plaintiffs Angel Armenta and Jakkob Romero, on behalf
5 of themselves and the conditionally certified settlement class, will and hereby do move the Court
6 for an order granting final approval of the proposed class action settlement, approving the payment
7 of civil penalties, approving the class representative service payments provided for the class action
8 settlement, and approving payment of the Settlement Administrator's fees and expenses. Plaintiffs
9 also will and hereby do move the Court for an order granting an award of attorney's fees in the
10 amount of \$533,333.33 and costs in the amount of \$15,000.00, as provided in the proposed class
11 action settlement.

12 This motion is brought under California Rule of Court 3.769, on the grounds that the
13 settlement is fair, reasonable and adequate and in the best interests of the class, and meets all
14 requirements for class certification. The requested class representative service payments are fair
15 and reasonable under the circumstances of the case. The requested attorney's fees and costs are
16 fair and reasonable under the circumstances of the case.

17 This motion will be based on this Notice of Motion and Motion, the accompanying
18 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying Declarations
19 of Jamie K. Serb, Justin F. Marquez, and Markus Balthuis, the Court's entire file herein, and on
20 such further evidence and argument as may be presented at the hearing..

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22 Dated: September 12, 2023

CROSNER LEGAL, P.C.

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Zachary Crosner

Jamie K. Serb

Attorneys for Plaintiff Jakkob Romero