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[Additional Counsel on Next Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MERCED**

KAYLYN BUSH and MADELEINE
GUEVARA, on behalf of themselves, and all
aggrieved employees,

Plaintiffs,

v.

DUTCH BROS., LLC; and DOES 1 through
100, inclusive,

Defendants.

Case No: 22CV-01415

REPRESENTATIVE ACTION

*Assigned for all purposes to the
Hon. Brian McCabe, Dept. 8*

**NOTICE OF MOTION AND MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF PAGA ACTION AND
DISMISSING ACTION WITH PREJUDICE**

Date: December 13, 2023
Time: 8:15 a.m.
Dept. 8

Complaint filed: May 19, 2022
Trial Date: TBD

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15 KAYLYN BUSH and MADELEINE GUEVARA
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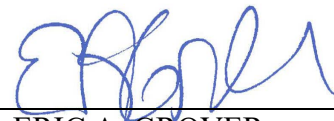
1 **PLEASE TAKE NOTICE THAT** on December 13, 2023 at 8:15 a.m., or as soon
2 thereafter as the matter may be heard, in Department 8 of the above-entitled Court, located at Old
3 Merced Courthouse, 627 West 21st Street, Merced, California 95340, Kaylyn Bush and
4 Madeleine Guevara (“Plaintiffs”), will and hereby do move unopposed for an Order: (1) granting
5 approval, pursuant to California Labor Code § 2699(l)(2), of the proposed settlement of claims
6 brought pursuant to the Labor Code Private Attorneys General Act of 2004 (Labor Code §§ 2698
7 *et seq.*) against Dutch Bros., LLC (“Defendant”) set forth in the Parties’ Labor Code Private
8 Attorneys General Act Settlement Agreement (the “Settlement Agreement”); (2) appointing
9 Simpluris, Inc. as the Settlement Administrator; and (3) directing disbursement of the Settlement
10 Amount pursuant to the terms of the Settlement Agreement.

11 This motion will be based on this Notice, the supporting memorandum of points and
12 authorities, the Settlement Agreement, the Declarations of Eric A. Grover, Robert Spencer, and
13 Vincent Granberry, the documents and records on file in this matter, and such additional
14 arguments, authorities, and evidence and other matters as may be presented by the Parties
15 hereafter.

16
17 Dated: October 25, 2023

KELLER GROVER LLP

18
19 By: _____



ERIC A. GROVER
ROBERT SPENCER
Counsel for Plaintiffs
KAYLYN BUSH AND MADELEINE
GUEVARA

PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On October 27, 2023, in the case of *Bush, et al., v. Dutch Bros., LLC, et al.*, Merced Superior Court Case Number 22CV-01415, I served the foregoing document(s):

NOTICE OF MOTION AND MOTION FOR AN ORDER APPROVING SETTLEMENT OF PAGA ACTION AND DISMISSING ACTION WITH PREJUDICE

on the interested party(ies) below, using the following means:

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


JOEY GONZALEZ