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7 Attorneys for Plaintiff VIJAY SHETH, as an individual,
and on behalf of all others similarly situated
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10 **SUPERIOR COURT OF CALIFORNIA**
11 **IN AND FOR THE COUNTY OF LOS ANGELES**

12 VIJAY SHETH, as an individual and on
behalf of all others similarly situated,

13 Plaintiff,

14 vs.

15 ICON BURGER ACQUISITION LLC, a
Delaware limited liability company;
16 SMASHBURGER ACQUISITION-SO CAL
LLC, a Delaware limited liability company;
17 SMASHBURGER ACQUISITION – SAN
DIEGO LLC, a Delaware limited liability
18 company; SMASHBURGER
ACQUISITION – SACRAMENTO LLC, a
19 Delaware limited liability company; and
DOES 1-100, inclusive,
20

21 and DOES 1-100, inclusive,

22 Defendants.
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CASE NO.: 22STCV09093

Assigned for All Purposes to:
Hon. Elaine Lu
Dept SSC-9

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

DATE: April 15, 2025
TIME: 10:00 a.m.
DEPT.: SSC-9

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

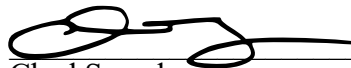
2 **PLEASE TAKE NOTICE THAT** that on April 15, 2025, at 10:00 a.m., or as soon
3 thereafter as the matter may be heard, in Department SSC-9 of the above-captioned Court, located
4 at 312 N. Spring St., Los Angeles, California, plaintiff Vijay Sheth, on behalf of himself and the
5 conditionally certified settlement class, will and hereby does move the Court for an order granting
6 final approval of the proposed class and PAGA action settlement, approving the payment of civil
7 penalties, approving the class representative service payment provided for the class action
8 settlement, and approving payment of the Settlement Administrator's fees and expenses. Plaintiff
9 also will and hereby does move the Court for an order granting an award of attorney's fees in the
10 amount of \$329,947.00 (33.33% of the gross settlement amount) and costs in the amount of
11 \$14,886.34, as provided in the proposed class 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 payment is fair and
15 reasonable under the circumstances of the case. The requested attorney's fees and costs are fair
16 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
19 Declarations of Chad Saunders and Bryn Bridley, the Court's entire file herein, and on such further
20 evidence and argument as may be presented at the hearing.

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22 Dated: March 11, 2025

CROSNER LEGAL, P.C.

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25 Chad Saunders
26 Zachary Crosner
27 Jamie Serb
28 Attorneys for Plaintiff VIJAY SHETH