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Attorneys for Anthony Morris, on behalf of himself
and all others similarly situated

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

ANTHONY MORRIS, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

THE LINCOLN NATIONAL LIFE
INSURANCE COMPANY, an Indiana
Corporation; LINCOLN NATIONAL
CORPORATION, an Indiana Corporation;
and DOES 1 Through 10, Inclusive,

Defendants.

Case No. 22STCV20426

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Lawrence P. Riff

Department SS7

CLASS AND REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION FOR
ORDER GRANTING FINAL APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Hearing Set By November 1, 2023 Order

Date: May 13, 2024

Time: 10:00 a.m.

Dept: SS 7

Judge: Lawrence P. Riff

Complaint filed: June 22, 2022

Trial date: Not set

PLEASE TAKE NOTICE that on May 13, 2024 at 10:00 a.m., or as soon as the matter may be heard before the Hon. Lawrence P. Riff in Department 7 of the above-entitled Court, in the Spring Street Courthouse located at 312 North Spring Street, Los Angeles, California 90012, pursuant to California Rules of Court 3.769, Plaintiff Anthony Morris, on behalf of himself, Participating Class Members and Aggrieved Employees, moves this Court for an Order Granting Final Approval of Class Action and PAGA Settlement as set forth in the fully-executed Amended Class Action and PAGA Settlement Agreement and Class Notice filed October 10, 2023 (“Agreement”). Plaintiff moves this Court to:

1. Finally adjudicate the Settlement is fair, reasonable, and adequate;
2. Direct distribution of Individual Settlement Payments by the Settlement Administrator to all Participating Class Members and Aggrieved Employees in accordance with the Agreement;
3. Approve and direct payment to Class Counsel for their attorneys’ fees in the sum of \$166,650.00 and reimbursement of their litigation costs of \$12,000.00.
4. Approve and direct the Class Representative Service Payment award of \$7,500.00 to the Plaintiff Anthony Morris.
5. Approve and direct the PAGA Payment to the California Labor Workforce and Development Agency of \$18,750.00 (75% of \$25,000.00).
6. Approve and direct the payment to CPT Group, Inc., the appointed Settlement Administrator, of \$9,000.00 for its fees and costs in administering the Settlement.
7. Direct the Clerk of the Court to enter final judgment, and without affecting the finality of the final judgment, to reserve the Court’s continuing jurisdiction over the Parties for the purposes of implementing, enforcing, effectuating, or administering the terms of the Agreement.

This motion is made on the grounds that the proposed Settlement, preliminarily approved by this Court on November 1, 2023, is the product of arms’-length, good-faith negotiations, is fair and reasonable to the Class, and should be finally approved, as more fully discussed in the accompanying Memorandum in Support of Final Approval.

1 This motion is based on this Notice of Motion, the Memorandum of Points and Authorities
2 in Support, Declarations of Class Counsel Marta Manus and Sahag Majarian, II, and Declaration
3 of Class Representative Anthony L. Morris, Declaration of Jeremy Talavera on behalf of CPT
4 Group, Inc., the Agreement and Class Notice, the Order Granting Preliminary Approval of Class
5 Action Settlement issued November 1, 2023, the [Proposed] Order Granting Final Approval of
6 Class Action Settlement and [Proposed] Judgment, the Court's files in this matter, including but
7 not limited to, the Motion for Preliminary Approval of Class Action Settlement and supplemental
8 briefing, and any other documents or evidence the Court may consider at the hearing.

9 Respectfully submitted,

10 COHELAN KHOURY & SINGER
11 MAJARIAN LAW GROUP, APC

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13 Dated: April 16, 2024

14 By: 

15 Michael D. Singer

16 Marta Manus

17 Attorneys for Plaintiff Anthony Morris, on behalf
18 of himself and all others similarly situated
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