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8 Attorneys for Plaintiff MARIO BRICENO

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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12 MARIO BRICENO, on behalf of himself,
13 the State of California, and others similarly
situated and aggrieved,

14 Plaintiff,
15

16 v.

17 MONOGRAM AEROSPACE
18 FASTENERS, INC., a Delaware
corporation; TRIMAS CORPORATION, a
19 Delaware corporation; and DOES 1-100,
20 inclusive,

21 Defendants.
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Case No.: 22STCV21965

Assigned for All Purposes to:
Christopher K. Lui
Dept. 76

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

Date: December 2, 2024

Time: 8:30 A.M.

Dept.: 76

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT on December 2, 2024, at 8:30 a.m., or as soon thereafter
3 as the matter may be heard, in Department 76 of the above-entitled Court, located at 111 N. Hill St.,
4 Los Angeles, California, Plaintiff Mario Briceno on behalf of himself and the conditionally certified
5 settlement class, will and hereby does move the Court for an order granting final approval of the
6 proposed class action settlement, approving the payment of civil penalties, approving the class
7 representative service payment to Plaintiff provided for in the class action settlement, and approving
8 payment of the Settlement Administrator's fees and expenses. Plaintiff also will and hereby does
9 move the Court for an order granting an award of attorney's fees in the amount of \$170,833.33
10 (33.33% of the gross settlement amount) and costs in the amount of \$15,683.40, as provided in the
11 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 and
16 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 Sepideh Ardestani and Lluvia Islas, the Court's entire file herein, and on such further evidence
20 and argument as may be presented at the hearing.

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22 Dated: November 1, 2024

CROSNER LEGAL, PC

23
24 By: 

25 Jamie K. Serb, Esq.
26 Sepideh Ardestani, Esq.
27 Zachary M. Crosner, Esq.
28 Attorneys for Plaintiff,
MARIO BRICENO