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Attorneys for Plaintiff

SUPERIOR COURT OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

HUONG BUI, on behalf of himself and others
similarly situated and aggrieved,

Plaintiff,

v.

SPECTRUM LIFESCIENCES, LLC, a
Delaware limited liability company;
REPLIGEN CORPORATION, a Delaware
corporation; and DOES 1 to 100, inclusive,

Defendants.

Case No.:22STCV12522

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

UNOPPOSED

**NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: November 12, 2024
Time: 10:00 a.m.
Dept.: SSC-9

Briefing Schedule:

Motion: July 14, 2024
Opposition: October 23, 2024
Reply: October 29, 2024

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

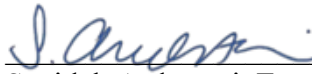
3 **PLEASE TAKE NOTICE THAT** that on November 12, 2024, at 10:00 a.m. or as soon
4 thereafter as the matter may be heard, in Department SSC-9 of the above-captioned Court, located
5 at 312 N. Spring St., Los Angeles, California, plaintiff Huong Bui will move the Court for
6 preliminary approval of a proposed class action settlement in the above-captioned action under
7 Cal. Rule of Court 3.769. The terms of the settlement are contained within the Class Action and
8 PAGA Settlement Agreement and Class Notice ("Settlement Agreement"), filed concurrently
9 herewith as Exhibit 1 to the Declaration of Sepideh Ardestani. In addition, Plaintiff requests that
10 the Court conditionally certify the class described in the Settlement Agreement for purposes of
11 settlement only; approve the form of class notice attached as Exhibit A to the Settlement
12 Agreement; approve Crosner Legal P.C. as Class Counsel and plaintiff Huong Bui as the Class
13 Representative, approve Simpluris, Inc. as the Settlement Administrator, and set a final approval
14 hearing.

15 This motion will be based on this Notice of Motion and Motion, the accompanying
16 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying
17 Declarations of Sepideh Ardestani, Huong Bui, and Eric Springer, the Court's entire file herein,
18 and on such further evidence and argument as may be presented at the hearing.

19 The Court has set the following briefing scheduled: the Motion must be filed by July 14,
20 2024. The Opposition, if any, must be filed by October 23, 2024. Any Reply brief must be filed
21 by October 29, 2024.

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23 Dated: July 11, 2024

CROSNER LEGAL, P.C.

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26 Sepideh Ardestani, Esq.
27 Zachary Crosner, Esq.
28 Jamie Serb, Esq.