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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO-CENTRAL DIVISION

VERNON BARNETT, individually and
as an aggrieved employee pursuant to the
Private Attorneys General Act ("PAGA")
on behalf of the State of California and
other aggrieved employees,

Plaintiffs,

vs.

QW INSURANCE SOLUTIONS, LLC,
a Washington limited liability company;
LENDINGTREE INC., a Delaware
corporation; LENDINGTREE LLC, a
Delaware limited liability company; and
DOES 3 through 50,

Defendants.

Case No.: 37-2022-00019924-CU-OE-
CTL

Judge: Hon. Katherine Bacal
Dept. C-69

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS AND
PAGA SETTLEMENT AND FOR
ATTORNEYS' FEES, COSTS,
REPRESENTATIVE
ENHANCEMENT PAYMENT,
ADMINISTRATION EXPENSES,
AND ENTRY OF JUDGMENT**

Judge: Hon. Katherine Bacal
Dept.: C-69
Hearing Date: Sept. 6, 2024
Hearing Time: 1:30 p.m.

Complaint Filed: May 25, 2022
Trial Date: NA
Discovery Cutoff: NA

[[Prop.] Order, Mem. of P&As, and
Decs. of Thomas D. Rutledge, Kevin
Lee, and Vernon Barnett filed
concurrently herewith]

**TO ALL PARTIES, THEIR ATTORNEYS OF RECORD, AND THIS
HONORABLE COURT:**

PLEASE TAKE NOTICE THAT on **September 6, 2024**, at **1:30 p.m.** in Department C-69 of the San Diego Superior Court located at 330 West Broadway, San Diego, California 92101, Plaintiff Vernon Barnett, on behalf of himself, the provisionally certified FCRA Class and Wage and Hour Class (collectively, “Class Members”), which have been certified for settlement purposes only, the Aggrieved Employees, and the State of California as its designated proxy (collectively, “Plaintiffs”), will and hereby does move this Court pursuant to Code of Civil Procedure § 382 for final approval of a class action and Private Attorney General Act settlement, payment of Class Counsel’s fees and costs, payment of the named Plaintiff’s representative enhancement payment and general release award, and settlement administration expenses.

This motion is based on this Notice, Plaintiffs’ accompanying Memorandum of Points and Authorities, the accompanying declarations of Thomas D. Rutledge and the Claims Administrator who handled the settlement administration of this matter so far, the pleadings, records and files in this action, and such argument and evidence that may be presented at or before the hearing.

Dated: August 12, 2024

Law Office of Thomas D. Rutledge

By: Thomas D. Rutledge

/s/Thomas D. Rutledge

Attorneys for the Plaintiffs and the
Provisionally Certified Class

PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

I, THOMAS D. RUTLEDGE, the undersigned, am employed in the County of San Diego, State of California; I am over the age of 18 and not a party to the within action; my business address is 16956 Via de Santa Fe, Suite 1847, Rancho Santa Fe, California 92091-4606.

On August 12, 2024, I served the foregoing document(s) described as:

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL
APPROVAL OF CLASS AND PAGA SETTLEMENT AND FOR
ATTORNEYS' FEES, COSTS, REPRESENTATIVE ENHANCEMENT
PAYMENT, ADMINISTRATION EXPENSES, AND ENTRY OF JUDGMENT**

on the interested parties to this action by placing a copy thereof enclosed in a sealed envelope addressed as follows: **See Attached List.**

☒ **(BY MAIL)** I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. This correspondence was deposited with the United States Postal Service this same day in the ordinary course of business at our Firm's office address in San Diego, California. Service made pursuant to this paragraph, upon motion of a party served, shall be presumed invalid if the postal cancellation date of postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.

☒ **(BY E-MAIL via E-file)** I am readily familiar with the business practice for collection and processing of correspondence for emailing with the Court authorized third-party vendor. This correspondence was sent via email via this third-party vendor pursuant to the vendor's policies and practices.

☐ **(BY OVERNIGHT DELIVERY SERVICE)** I served the foregoing document by Federal Express, an express service carrier which provides overnight delivery, as follows. I placed true copies of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed to each interested party as set forth above, with fees for overnight delivery paid or provided for.

☐ **(BY PERSONAL SERVICE)** I caused such envelope to be delivered by hand to the offices of the above named addressee(s).

☐ **(BY FACSIMILE)** I caused such documents to be delivered via facsimile to the offices of the addressee(s) at the following facsimile number:

Executed August 12, 2024, at San Diego, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

THOMAS D. RUTLEDGE
/s/THOMAS D. RUTLEDGE

SERVICE LIST

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