

JAMIE K. SERB (SBN 289601)
jamie@crosnerlegal.com
NIKKI TRENNER (SBN 316007)
nikki@crosnerlegal.com
ZACHARY M. CROSNER (SBN 272295)
zach@crosnerlegal.com
CROSNER LEGAL, P.C.
9440 Santa Monica Blvd., Suite 301
Beverly Hills, CA 90210
Tel. (866) 276-7637
Fac. (818) 700-9973

Attorneys for Plaintiff STEPHANY CLUCK

SUPERIOR COURT OF CALIFORNIA
IN AND FOR THE COUNTY OF RIVERSIDE

STEPHANY CLUCK, as an individual on behalf
of herself and on behalf of all others similarly
situated

Plaintiff,

v.

CHILDHELP, INC., A CALIFORNIA NON-
PROFIT CORPORATION; AND DOES 1-
100, INCLUSIVE,

Defendants.

Case No.: CVRI2202276

Assigned for All Purposes to:
Hon. Harold Hopp
Dept. 1

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

[Filed concurrently with Memorandum of
Points & Authorities; Declarations of Nikki
Trenner and Sean Hartranft; [Proposed]
Order]

Date: March 20, 2025
Time: 8:30 a.m.
Dept.: 1

Reservation No.: 794918977781

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT on March 20, 2025, at 8:30 a.m., or as soon thereafter as
3 the matter may be heard, in Department 1 of the above-entitled Court, located at 4050 Main St.,
4 Riverside, California, Plaintiff Stephany Cluck will move the Court for preliminary approval of a
5 proposed class action settlement in the above-captioned action under Cal. Rule of Court 3.769.
6 The terms of the settlement are contained within the Class Action and PAGA Settlement
7 Agreement (the "Settlement Agreement"), filed concurrently herewith as Exhibit 1 to the
8 Declaration of Nikki Trenner. In addition, Plaintiff requests that the Court certify the class
9 described in the Settlement Agreement; approve the form of class notice attached as Exhibit A to
10 the Settlement Agreement, the form of exclusion form attached as Exhibit B to the Settlement
11 Agreement, and the form of objection form attached as Exhibit C to the Settlement Agreement;
12 approve Crosner Legal, P.C. as Class Counsel, and plaintiff Stephany Cluck as the Class
13 Representative, approve Apex Class Action, LLC as the Settlement Administrator, and set a final
14 approval hearing for July 30, 2025, or the first available date on the Court's calendar thereafter.

15 The motion will be based upon this notice of motion and motion, the accompanying
16 memorandum of points and authorities, declarations of Nikki Trenner and Sean Hartranft, the
17 Settlement Agreement, the Court's entire file herein, and on such other argument and evidence as
18 the Court may entertain at the hearing on this motion.

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20 Dated: February 7, 2025

CROSNER LEGAL, P.C.

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22 _____
23 Zachary M. Crosner
24 Jamie K. Serb
25 Nikki Trenner
26 Attorneys for Plaintiff STEPHANY CLUCK
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