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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES**

10
11 **ALBERT KNAPP** and **ELHAM TABIBIAN**,
12 individually and on behalf of all others similarly
situated,

13 Plaintiff,

14 v.

15 **PEPPERDINE UNIVERSITY**, a California
16 Non-Profit Corporation,
17

18 Defendant.
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Case No. 22SCTV16736

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

Date: June 20, 2023

Time: 9:00 a.m.

Dept.: 17, Hon. Maren Nelson

1 NOTICE IS HEREBY GIVEN that, on June 20, 2023 at 9:00 a.m., or as soon thereafter as the
2 matter may be heard, Plaintiffs Albert Knapp and Elham Tabibian will and hereby do move for entry of
3 the proposed Order filed herewith (1) granting certification of the proposed settlement class; (2) granting
4 preliminary approval of the Parties' class action settlement; (3) ordering the proposed Class Notice to be
5 sent to the settlement class; (4) preliminarily approving Class Counsel's requested attorneys' fees and
6 costs and the Class Representative Service Awards; and (5) setting a date and time for a Final Approval
Hearing.

7 This motion is based upon this Notice of Motion; the Memorandum of Points and Authorities in
8 Support hereof; the Declaration of Julian Hammond in Support of the Motion; Declarations of Named
9 Plaintiffs; Declaration of the Settlement Administrator; Declaration of Defendant's Counsel In Support;
10 Proposed Order; and such other evidence or argument as may be presented to the Court at the hearing on
this motion.

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12 Dated: February 28, 2023

Respectfully submitted,

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15 Julian Hammond
HammondLaw, P.C.
16 *Attorney for Plaintiffs and the Putative Class*
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