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Attorneys for Plaintiffs
TLALOC MUNOZ, MIGUEL RUIZ, EDGAR CORONA, and STEVEN SNAVELY

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF CALIFORNIA**

TLALOC MUNOZ, an individual; MIGUEL RUIZ, an individual; EDGAR CORONA, an individual; STEVEN SNAVELY, an individual, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

EARTHGRAINS DISTRIBUTION, LLC a Delaware limited liability company; BIMBO BAKERIES USA, INC., a Delaware corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 3:22-cv-01269-AJB-AHG

**PLAINTIFFS' NOTICE OF MOTION AND UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

**Hearing Date**: November 12, 2026
**Time**: 10:00 a.m.
**Courtroom:** 4A

**Judge**: Hon. Anthony J. Battaglia
**Magistrate**: Hon. Allison H. Goddard

**SAC Filed**: January 23, 2026
**Trial Date**: None Set

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

**PLEASE TAKE NOTICE** that on November 12, 2026, at 10:00 a.m., or as soon thereafter as the matter may be heard, before the Honorable Anthony J. Battaglia, in Courtroom 4A of the above referenced Court, Plaintiffs Tlaloc Munoz, Miguel Ruiz, Edgar Corona, and Steven Snavely ("Plaintiffs") on behalf of themselves and all others similarly situated, will, and hereby do, move this Court to:

1) Finally approve the Stipulation of Class and PAGA Representative Action Settlement ("Settlement"), ECF No. 116-3, as fair, reasonable, and adequate, and direct the parties to carry it out according to its terms;

2) Finally certify the Settlement Class for settlement purposes only pursuant to Fed. R. Civ. P. 23(b)(3);

3) Confirm the appointment of Plaintiffs Tlaloc Munoz, Miguel Ruiz, Edgar Corona, and Steven Snavely as the Class Representatives and Nicholas & Tomasevic, LLP as Class Counsel;

4) Find that the Notice of Settlement satisfied Rule 23 and due process;

5) Approve USD School of Law Workers Rights Clinic as the *cy pres* recipient under Settlement §§ 4.12 and 5.1, in place of Feeding San Diego;

6) Approve the PAGA settlement and direct payment of $262,500 to the LWDA and $87,500 in Individual PAGA Payments to PAGA Members;

7) Approve CPT Group, Inc.'s Settlement Administration Costs of $15,000;

8) Bar the Released Class Claims and Released PAGA Claims, enter judgment, and dismiss the action with prejudice, while retaining jurisdiction over implementation and enforcement of the Settlement;

9) Direct Plaintiffs to file a status report after distribution covering completion of payments, the final Arbitration Agreement count, and any distribution of *cy pres* payments.

This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points and Authorities filed herewith; (3) the Settlement (ECF No. 116-3); (4) the Declarations of Shaun Markley, Laura Singh of CPT Group, Inc., Tlaloc Munoz, Miguel Ruiz, Edgar Corona, and Steven Snavely, and related exhibits filed herewith; (5) the Court's Preliminary Approval Order (ECF No. 120) and the other records, pleadings, and papers filed in this action; and (6) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Respectfully submitted,

DATED: October 15, 2026

**NICHOLAS & TOMASEVIC, LLP**

By: */s/ Shaun Markley*

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