

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)

Eduardo Garcia (State Bar #290572)

5440 Morehouse Drive, Suite 3500

San Diego, CA 92121

Telephone: (619)599-8292

Facsimile: (619) 599-8291

jlapuyade@jcl-lawfirm.com

egarcia@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)

Jackland K. Hom (State Bar #327243)

5440 Morehouse Drive, Suite 3500

San Diego, CA 92121

Telephone: (619)255-9047

Facsimile: (858) 404-9203

shani@zakaylaw.com

jackland@zakaylaw.com

Attorneys for Plaintiff ERIK FOSS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SHASTA

ERIK FOSS, individually and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

ANDERSON HOSPITALITY, INC., a
California corporation and DOES 1 through
50, Inclusive,

Defendants.

Case No. 195317

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

Date: July 18, 2022

Time: 8:30 a.m.

Judge: Stephen H. Baker

Dept.: 3

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on July 18, 2022, or as soon thereafter as the matter can be heard, in Department 3 of the above-entitled Court, before the Honorable Judge Stephen H. Baker, Plaintiff ERIK FOSS (“Plaintiff”) will apply for an order will apply for an order granting (1) Final Approval of the Class Action Settlement, and (2) Entry of the Final Approval Order and Judgment.

This Motion is brought in accordance with the Preliminary Approval Order dated March 14, 2022, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, the Second Amended Stipulation of Settlement of Class Action Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the Declaration of Lluvia Islas, (the Settlement Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

Because all parties have agreed to the proposed class settlement and have met and conferred regarding the motion, this motion is not opposed by Defendant. To date, there have been no objections submitted by the Class.

Respectfully submitted,

DATED: June 22, 2022

JCL LAW FIRM, APC

By: Jean-Claude Lapuyade
Jean-Claude Lapuyade
Attorneys for Plaintiff