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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF BUTTE

THOMAS HAVEN, BRETT OWENS, AND
DONAVON PATTERSON individuals, on
behalf of themselves and on behalf of all
persons similary situated,

Plaintiffs,

v.

CALIFORNIA VOCATIONS, INC., a
California Corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 20CV01514

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

Date: October 19, 2022

Time: 9:00 a.m.

Judge: Stephen E. Benson

Dept.: 6

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that as soon as this matter may be heard, in Department 6 of the Butte
3 County Superior Court, the Honorable Judge Stephen E. Benson presiding, plaintiffs THOMAS
4 HAVEN, BRETT OWENS, and DONAVON ZACHARIAH PATTERSON will, and hereby do, move
5 this Court to:

6 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
7 and PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the
8 Declaration of Jean-Claude Lapuyade, Esq. filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement to
11 the Class;

12 4. Appoint Plaintiffs THOMAS HAVEN, BRETT OWENS, and DONAVON
13 ZACHARIAH PATTERSON as the Class Representatives;

14 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; and

15 7. Set a hearing date for final approval of the settlement.

16 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points
17 and Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement;
18 (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5)
19 the Declarations of Thomas Haven, Brett Owens, and Donavon Zachariah Patterson; (6) the
20 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit
21 attached thereto; (7) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA
22 Settlement and exhibits attached thereto; (8) the records, pleadings, and papers filed in this action; and
23 (9) upon such other documentary and oral evidence or argument as may be presented to the Court at
24 or prior to the hearing of this Motion.

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1 **As this Motion is unopposed, the Parties respectfully request relief from the page limit**
2 **requirement set by California Rules of Court, Rule 3.1113(d).**

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4 Dated: September 16, 2022

JCL LAW FIRM, APC

5 By: 
6 Jean-Claude Lapuyade

7 Attorney for Plaintiff
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