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Attorneys for Plaintiffs and the Putative Classes

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

CHRISTOPHER PAHL and **KELLY LESLIE**,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

CEC EMPLOYEE GROUP, LLC, a Delaware
Limited Liability Company, **COLORADO**
TECHNICAL UNIVERSITY, INC., a
Colorado Corporation, **AMERICAN**
INTERCONTINENTAL UNIVERSITY
SYSTEM, INC., a Georgia Corporation,
TRIDENT UNIVERSITY
INTERNATIONAL, LLC, a Delaware
Corporation, **AMERICAN**
INTERCONTINENTAL UNIVERSITY, INC.,
a Georgia Corporation, and **CALIFORNIA**
SOUTHERN UNIVERSITY,

Defendants.

CASE NO. 34-2022-00322588

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

Date: December 15, 2023

Time: 9:00 a.m.

Dept. 28; Hon. Lauri A. Damrell

Reservation No. A-322588-001

1 NOTICE IS HEREBY GIVEN that, on December 15, 2023 at 9:00 a.m., or as soon thereafter as
2 the matter may be heard, Plaintiffs will and hereby do move the Court for entry of the proposed Order
3 filed herewith (1) granting certification of the proposed settlement classes; (2) granting preliminary
4 approval of the Parties' class action settlement; (3) ordering the proposed Class Notice to be sent to the
5 proposed settlement classes; (4) preliminarily approving Class Counsel's requested attorneys' fees and
6 costs and the requested 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 and Motion; the Memorandum of Points and
8 Authorities in Support hereof; the Declaration of Julian Hammond in Support of the Motion; the Proposed
9 Order; and such other evidence or argument as may be presented to the Court at the hearing on this motion.

10 Pursuant to Sacramento County Superior Court Local Rule 1.06 (A), the Court will make a
11 tentative ruling on the merits of this matter by 2:00 p.m., the court day before the hearing. The complete
12 text of the tentative rulings for the department may be downloaded off the court's website. If the party
13 does not have online access, they may call the dedicated phone number for the department as referenced
14 in the local telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the
15 hearing and receive the tentative ruling. If you do not call the court and the opposing party by 4:00 p.m.
16 the court day before the hearing, no hearing will be held.

17 Dated: November 21, 2023

Respectfully submitted,

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20 Julian Hammond
21 Ari Cherniak
22 HammondLaw, P.C.
23 *Attorney for Plaintiffs and the Putative Classes*
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