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Attorneys for Plaintiff JUAN GARCIA, on behalf of himself
and all others similarly situated and the general public
(*additional counsel listed on next page*)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JUAN GARCIA, on behalf of himself
and all others similarly situated and the
general public,

Plaintiff,

v.

WAL-MART STORES, INC., a
Delaware corporation; and DOES 1 to
100, inclusive,

Defendants.

} Case No.: 5:16-cv-01645 TJH (RAOx)
} Hon. Terry J. Hatter
} Courtroom: 9C, 9th Floor

} CLASS ACTION

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

} Under Submission
} Courtroom 9B, 9th Fl.

} Action Filed: May 17, 2016
} Removal Date: July 28, 2016
} Trial Date: May 30, 2023

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20 and all others similarly situated and the general public
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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on August 29, 2023, or as soon thereafter as the
3 matter may be heard by the Honorable Terry J. Hatter, Plaintiff will move for an order
4 granting preliminary approval of class action and PAGA settlement. Good cause exists
5 for the granting of the Motion in that the proposed settlement is fair, reasonable and
6 adequate.

7 This motion is made following the conference of counsel pursuant to L.R. 7-3
8 which took place as part of the parties' settlement negotiations, and once the agreement
9 was signed and Plaintiff shared his motion with Defendant's counsel. (**Decl. Carney ¶**
10 **12**) It is anticipated that there will be no opposition to this Motion seeking approval of
11 the settlement.

12 The Motion will be based on this Notice of Motion, the Declarations of Janelle
13 Carney, Joseph Antonelli, Kevin T. Barnes, and Anna R. Salusky; Declaration of Juan
14 Garcia; the Memorandum of Points and Authorities, and on such oral and documentary
15 evidence as may be presented at the hearing on the Motion.

16 Dated: August 3, 2023

LAW OFFICE OF JOSEPH ANTONELLI
JANELLE CARNEY-ATTORNEY AT LAW
LAW OFFICE OF KEVIN BARNES
SALUSKY LAW GROUP, APC

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20 By:



21 Janelle Carney,
22 Attorney for Plaintiff and the Class
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