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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

SHASTA COLLINS, on behalf of herself and
on behalf of all persons similarly situated,

Plaintiff,

v.

HILTON MANAGEMENT, LLC, a Delaware
limited liability company; and DOES 1 through
50, Inclusive;

Defendants.

Case No. CGC-21-590959

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

Date: June 16, 2025

Time: 9:30 a.m.

Judge: Hon. Christine Van Aken

Dept: 301

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on June 16, 2025, or as soon thereafter
3 as the matter can be heard, in Room 301 of the above-entitled Court, before the Honorable Judge
4 Christine Van Aken, Plaintiff SHASTA COLLINS (“Plaintiff”) will apply for an order granting (1)
5 Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final Approval
6 Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated October
8 10, 2024, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, Stipulation of Settlement of Class and PAGA Action Claims
10 and Release of Claims (hereinafter the “Agreement”), the Declaration of Jean-Claude Lapuyade,
11 the Declaration of Shani O. Zakay, the Declaration of the Plaintiff, the Declaration of Madely Nava
12 and the complete files and records in this action.

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

16 Respectfully submitted,

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18 Dated: May 21, 2025

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19 By: Perssia Razma
20 Perssia P. Razma, Esq.
21 Attorney for Plaintiff
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