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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

JIE XU, individually and on behalf of all
persons similarly situated

Plaintiffs,

vs.

HT MULTINATIONAL, INC., a California
Corporation; CHTC (USA), INC., a California
Corporation; HT INDUSTRIES, INC., a
Corporation, and Does 1 through 50, Inclusive,

Defendants.

Case No: CIVDS2015679

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

Hearing Date: December 12, 2022
Hearing Time: 10:00 a.m.
Judge: Hon. David Cohn
Dept: S-26

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on December 12, 2022, or as soon
3 thereafter as the matter can be heard, in Department S-26 of the above-entitled Court, before the
4 Honorable Judge David Cohn, Plaintiff Jie Xu ("Plaintiff") will apply for an order granting (1)
5 Final Approval of the Class Action Settlement, and (2) Entry of the Final Approval Order and
6 Judgment.

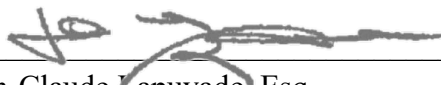
7 This Motion is brought in accordance with the Preliminary Approval Order dated July 15,
8 2022, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Class Action Settlement Agreement (hereinafter the
10 "Agreement"), the Declaration of Jean-Claude Lapuyade, the Declaration of Shani O. Zakay, the
11 Declaration of Krystal Quiroz (the Settlement Administrator), the Declaration of the Plaintiff Jie
12 Xu, and the complete files and records in this action.

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

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17 Respectfully submitted,

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19 DATED: November 15, 2022

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22 By: 
23 Jean-Claude Lapuyade, Esq.
24 Attorney for Plaintiff
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