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Attorneys for Plaintiffs and the Putative Class

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

PAUL FOSTER and ROY BLANCO,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

**EMBRY-RIDDLE AERONAUTICAL
UNIVERSITY, INC.,** a Florida Non-Profit
Corporation,

Defendant.

Case No. CVRI2202995

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

ASSIGNED FOR ALL PURPOSES TO
JUDGE HAROLD HOPP
DEPARTMENT 10

Date: July 13, 2023

Time: 8:30 a.m.

Reservation No.: 746466218315

Action Filed: July 20, 2022

Trial Date: None Set

1 NOTICE IS HEREBY GIVEN that, on July 13, 2023 at 8:30 a.m., or as soon thereafter as the
2 matter may be heard, Plaintiffs Paul Foster and Roy Blanco will and hereby do move for entry of the
3 Proposed Order filed herewith (1) granting certification of the proposed settlement class; (2) granting
4 preliminary approval of the Parties' class action settlement; (3) ordering the proposed Class Notice to be
5 sent to the settlement class; (4) preliminarily approving Class Counsel's requested attorneys' fees and
6 costs and the Class Representatives' requested Service Awards; and (5) setting a date and time for a
7 Final Approval Hearing.

8 This Motion is based upon this Notice of Motion; the Memorandum of Points and Authorities in
9 Support hereof; the Declarations of Proposed Class Counsel William C. Jhaveri-Weeks and Julian
10 Hammond in Support of the Motion; the Declaration of Defense Counsel Aaron A. Buckley in Support
11 of the Motion; the Declaration of Michael Sutherland on behalf of proposed settlement administrator
12 ILYM Group, Inc.; the Declaration of Silvia Argueta of proposed cy pres recipient Legal Aid
13 Foundation of Los Angeles; the Proposed Order; the pleadings and prior filings in this case; and such
14 other documentary and oral evidence or argument as may be presented to the Court at the hearing on this
15 Motion.

16 Dated: June 20, 2023

17 Respectfully submitted,

18 THE JHAVERI-WEEKS FIRM, P.C.

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22 William C. Jhaveri-Weeks

23 Sarah Abraham

24 Ally N. Girouard

25 *Attorneys for Plaintiffs and the Putative Class*