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9 ASHLEY MCCORD

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11 **SUPERIOR COURT OF CALIFORNIA**
12 **IN AND FOR THE COUNTY OF RIVERSIDE**
13

14 ASHLEY MCCORD, individually, and on
15 behalf of all similarly situated,

16 Plaintiff,

17 vs.

18 DEVELOPMENTAL CLIENT CARE,
19 INDUSTRIES, INC., and DOES 1 through
20 100, inclusive,

21 Defendants.
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CASE NO. RIC1612928

Assigned for All Purposes To:
Hon. Sunshine Sykes
Dept. 6

NOTICE OF MOTION AND MOTION FOR
APPROVAL OF SETTLEMENT UNDER
PRIVATE ATTORNEYS GENERAL ACT

[Filed concurrently with Memorandum of Points
and Authorities; Declaration of Zachary M.
Crosner; [Proposed] Order and Judgment]

DATE: June 6, 2019
TIME: 8:30 a.m.
DEPT.: 6

Reservation No.:

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on June 6, 2019, at 8:30 a.m., or as soon thereafter as the
3 matter may be heard, in Department 6 of the Riverside County Superior Court, located at 4050
4 Main Street, Riverside, California, Plaintiff Ashley McCord, on behalf of herself and the State of
5 California by and through the Labor Workforce and Development Agency, will and hereby does
6 move the Court for an order granting approval of the proposed settlement under the Private
7 Attorneys General Act, Labor Code sections 2698, *et seq.*, approving the payment of civil
8 penalties to the State and the Aggrieved Employees, approving payment of a representative
9 service payment to Plaintiff, approving payment of Plaintiff's Counsel's attorney's fees and
10 litigation costs, and approving payment of the Settlement Administrator's fees and expenses.

11 This motion is brought under Labor Code section 2699(l)(2), and on the grounds that the
12 settlement is fair, reasonable and adequate and meets all requirements for approval under PAGA.
13 The requested class representative service payment, attorney's fees and costs, and settlement
14 administration costs all are fair and reasonable under the circumstances of the case.

15 This motion is based upon this Notice of Motion, the accompanying memorandum of
16 points and authorities, the accompanying declaration of Zachary M. Crosner, the entire Court file
17 in this matter, and on such other argument and evidence as may be presented at or before the
18 hearing in this matter.

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20 Dated: May 14, 2019

CROSNER LEGAL, P.C.

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22 BY:



Zachary Crosner, Esq.

Attorneys for Plaintiff ASHLEY MCCORD