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7 Attorneys for Plaintiff ANTOINETTE BROWN, as an individual,
and on behalf of all others similarly situated,
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10 **SUPERIOR COURT OF CALIFORNIA**
11 **IN AND FOR THE COUNTY OF LOS ANGELES**

12 ANTOINETTE BROWN, as an individual
and on behalf of all others similarly
13 situated,

14 Plaintiff,
15 vs.

16 ELA FOODS, INC., a California
corporation; POP FOODS SERVICES,
INC., a California corporation; and
17 DOES 1-100, inclusive,

18 Defendants.
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CASE NO.: 22STCV26088

Assigned for All Purposes to:
Hon. Elaine Lu
Dept SSC-9

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT, AND REQUEST
FOR ATTORNEY'S FEES AND COSTS**

**[Filed concurrently with Memorandum of
Points & Authorities; Declarations of Nikki
Trenner and Bryn Bridley; [Proposed] Order]**

DATE: August 28, 2024

TIME: 10:00 a.m.

DEPT.: SSC-9

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

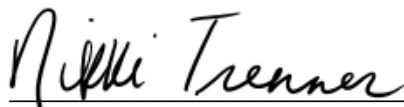
2 **PLEASE TAKE NOTICE THAT** that on August 28, 2024, at 10:00 a.m., or as soon
3 thereafter as the matter may be heard, in Department SSC-9 of the above-captioned Court, located
4 at 312 N. Spring St., Los Angeles, California, Plaintiff Antoinette Brown, on behalf of herself and
5 the conditionally certified settlement class, will and hereby does move the Court for an order
6 granting final approval of the proposed class action settlement, approving the payment of civil
7 penalties, approving the class representative service payment provided for the class action
8 settlement, and approving payment of the Settlement Administrator's fees and expenses. Plaintiff
9 also will and hereby does move the Court for an order granting an award of attorney's fees in the
10 amount of \$116,666.67 (33.33% of the gross settlement amount) and costs in the amount of
11 \$13,734.81, as provided in the proposed class action settlement.

12 This motion is brought under California Rule of Court 3.769, on the grounds that the
13 settlement is fair, reasonable and adequate and in the best interests of the class, and meets all
14 requirements for class certification. The requested class representative service payment is fair and
15 reasonable under the circumstances of the case. The requested attorney's fees and costs are fair
16 and reasonable under the circumstances of the case.

17 This motion will be based on this Notice of Motion and Motion, the accompanying
18 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying
19 Declarations of Nikki Trenner and Bryn Bridley, the Court's entire file herein, and on such further
20 evidence and argument as may be presented at the hearing.

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22 Dated: August 6, 2024

CROSNER LEGAL, P.C.

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24 Nikki Trenner
25 Zachary Crosner
26 Jamie Serb

Attorneys for Plaintiff ANTOINETTE BROWN