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8 Attorneys for Plaintiff DOUGLAS BALL
9 As an individual on behalf of himself and
on behalf of all others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN JOAQUIN**

12 DOUGLAS BALL, as an individual on
13 behalf of himself and on behalf of all others
similarly situated,

14
15 Plaintiff,

16 v.

17 KRUGER FOODS, INC., a California
18 corporation; and DOES 1-100, inclusive,

19 Defendants.
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Case No.: STK-CV-UOE-2022-0008581

Assigned for All Purposes to:
Hon. John Waters
Dept. 11B

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

Date: December 18, 2024
Time: 9:00 a.m.
Dept.: 11B

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

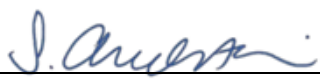
2 PLEASE TAKE NOTICE that on December 18, at 9:00 a.m., or as soon thereafter as the
3 matter may be heard, in Department 11B of the above-captioned Court, located 180 E. Weber
4 Ave., plaintiff Douglas Ball on behalf of himself and the conditionally certified settlement class,
5 will and hereby does move the Court for an order granting final approval of the proposed class
6 action settlement, approving the payment of civil penalties, approving the class representative
7 service payment provided for the class action settlement, and approving payment of the Settlement
8 Administrator's fees and expenses. Plaintiff also will and hereby does move the Court for an order
9 granting an award of attorney's fees in the amount of \$100,000 (1/3 of the gross settlement
10 amount) and costs in the amount of \$25,000, as provided in the proposed class action settlement.

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

16 This motion will be based on this Notice of Motion and Motion, the accompanying
17 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying Declarations
18 of Sepideh Ardestani and Madely Nava, the Court's entire file herein, and on such further evidence
19 and argument as may be presented at the hearing.

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21 Dated: November 19, 2024

CROSNER LEGAL, PC

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23 By: 
24 Jamie Serb, Esq.
25 Sepideh Ardestani, Esq.
26 Zachary M. Crosner, Esq.
27 Attorneys for Plaintiff,
28 DOUGLAS BALL