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Attorneys for Plaintiff
GUADALUPE HERNANDEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY**

GUADALUPE HERNANDEZ, on behalf of
himself, and all others similarly situated,

Plaintiff,

v.

AUTOMATED HARVESTING, LLC; and
DOES 1 through 50, inclusive,

Defendants.

Case No: 22CV002717

REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF PAGA ACTION AND
DISMISSING ACTION WITH PREJUDICE**

[Assigned for all purposes to The Honorable
Thomas A. Wills, Dept. 15]

Date: November 17, 2023

Time: 10:00 a.m. (matter will trail to end of
8:30 a.m. calendar)

Dept. 15

Complaint filed: September 13, 2022

FAC Filed: November 15, 2022

SAC Filed: December 20, 2022

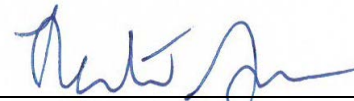
PLEASE TAKE NOTICE THAT on November 17, 2023 at 10:00 a.m. (please take note that this matter will trail to the end of the 8:30 a.m. calendar), or as soon thereafter as the matter may be heard, in Department 15 of the above-entitled Court, located at 1200 Aguajito Road, Monterey, California 93940, Plaintiff Guadalupe Hernandez (“Plaintiff”), will and hereby does move unopposed for an Order: (1) granting approval, pursuant to California Labor Code § 2699(l)(2), of the proposed settlement of claims brought pursuant to the Labor Code Private Attorneys General Act of 2004 (Labor Code §§ 2698 *et seq.*) against Automated Harvesting, LLC (“Defendant”) set forth in the Parties’ Labor Code Private Attorneys General Act Settlement Agreement (the “Settlement Agreement”); (2) appointing Simpluris, Inc. as the Settlement Administrator; and (3) directing disbursement of the Settlement Amount pursuant to the terms of the Settlement Agreement.

This motion will be based on this Notice, the supporting memorandum of points and authorities, the Settlement Agreement, the Declaration of Robert Spencer, the Declaration of Guadalupe Hernandez, the documents and records on file in this matter, and such additional arguments, authorities, and evidence and other matters as may be presented by the Parties hereafter.

Dated: October 10, 2023

KELLER GROVER LLP

By: _____



ERIC A. GROVER
ROBERT SPENCER
Counsel for Plaintiff
GUADALUPE HERNANDEZ

PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On October 10 2023, in the case of *Hernandez v. Automated Harvesting, LLC, et al.*, Monterey County Superior Court Case Number 22CV002717, I served the foregoing document(s):

NOTICE OF MOTION AND MOTION FOR AN ORDER APPROVING SETTLEMENT OF PAGA ACTION AND DISMISSING ACTION WITH PREJUDICE

on the interested party(ies) below, using the following means:

Andrew Levin
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Attorneys for Defendant
AUTOMATED HARVESTING, LLC

Michael Wilson
michael.wilson@ogletree.com

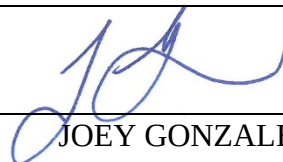
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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



JOEY GONZALEZ