

James R. Hawkins (SBN 192925)
Christina M. Lucio (SBN 253677)
James Hawkins APLC
9880 Research Drive, Suite 200
Irvine, CA 92618
(949) 387-7200
james@jameshawkinsaplc.com
christina@jameshawkinsaplc.com

Attorneys for Plaintiffs Efrain J. Sanchez, Alejandro Ruiz,
and Luis Franco on behalf of themselves and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

EFRAIN J. SANCHEZ, individually and on
behalf of others similarly situated,

Plaintiffs,

v.

GRUPO DECO CALIFORNIA
CORPORATION, a California Corporation;
GRUPO DECO AMERICA
CORPORATION, a Delaware Corporation;
and DOES 1-50, inclusive,

Defendants.

Case No. BC526934
Honorable Kenneth R. Freeman

**NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF
SETTLEMENT AGREEMENT**

Complaint Filed: November 6, 2013

Date: June 21, 2022
Time: 10:00 a.m.
Dept.: 14

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

2 **PLEASE TAKE NOTICE** that on June 21, 2022 at 10:00 a.m. in Department 14 of this
3 Court, located at Los Angeles Superior Court –Spring Street Courthouse, 312 North Spring
4 Street, Los Angeles, California 90012, or as soon thereafter as this matter can be heard, Plaintiffs
5 Efrain J. Sanchez, Alejandro Ruiz and Luis Franco (“Plaintiffs”) will and hereby do move this
6 Court for an order granting final approval of the Joint Stipulation of Class Action Settlement (the
7 “Settlement Agreement”) reached between Plaintiffs, on behalf of themselves and the
8 conditionally certified Class, and Defendants.

9 The Parties respectfully request that the Court (1) finally approve the settlement as fair,
10 adequate, and reasonable; (2) certify the Class for settlement purposes; (3) grant the Parties’
11 requested settlement administration expenses to the Settlement Administrator, ILYM Group,
12 Inc., which has managed the settlement administration; and (4) enter final judgment substantially
13 in the form of the proposed order submitted herewith.

14 The Settlement has been successfully administered, and good cause exists for granting
15 the Motion and finding the Settlement and claims administration expenses to be fair, reasonable,
16 and appropriate.

17 This motion is brought pursuant to California Rule of Court 3.769 and California Code of
18 Civil Procedure section 382, and is based on this Notice of Motion and Motion; the
19 Memorandum of Points and Authorities in support of the Motion; the Declaration of James R.
20 Hawkins; the Proposed Order Granting Final Approval of Class Action Settlement and
21 Judgement; the Declarations of Efrain J. Sanchez, Alejandro Ruiz and Luis submitted in
22 connection with Preliminary Approval; all documents currently on file in this action including
23 without limitation those submitted in support of preliminary approval; the arguments of counsel;
24 and such other and further evidence as the Court may choose to entertain.

25 ///

26 ///

1 This motion is set to be heard concurrently with Plaintiffs' Motion for Attorney's Fees
2 and Costs, and Class Representatives' Incentive Awards ("Motion for Attorneys' Fees and
3 Costs").

4
5 Dated: May 23, 2022

JAMES HAWKINS APLC

6
7 By:



James R. Hawkins

Christina M. Lucio

8
9
10 Attorneys for Plaintiffs and the
11 Conditionally Certified Class
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28