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8 *the Putative Class and Collective*

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF RIVERSIDE**

13 **GERRY DANIEL and BRYCE MONSON,**
14 individually and on behalf of all others
15 similarly situated,

16 Plaintiffs,

17 vs.

18 **MARS WRIGLEY CONFECTIONERY**
19 **US, LLC,** a Delaware Limited Liability
Company,

20 Defendant.

Case No. CVRI2204632

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
APPROVAL OF CLASS, COLLECTIVE,
AND REPRESENTATIVE ACTION
SETTLEMENT**

ASSIGNED FOR ALL PURPOSES TO
JUDGE HAROLD HOPP
DEPARTMENT 10

Date: May 13, 2024

Time: 8:30 a.m.

Reservation No.: 715960504311

Action Filed: October 25, 2022

Trial Date: None Set

1 NOTICE IS HEREBY GIVEN that, on May 13, 2024 at 8:30 a.m., or as soon thereafter as the
2 matter may be heard, Plaintiffs Gerry Daniel and Bryce Monson will and hereby do move for entry of
3 the Proposed Order filed herewith (1) granting certification of a provisional California settlement class
4 and nationwide Fair Labor Standards Act collective action; (2) granting preliminary approval of the
5 Parties' class, collective, and representative action settlement; (3) ordering the proposed California Class
6 Notice and Non-California Collective Action Notice to be distributed; (4) preliminarily approving Class
7 Counsel's requested attorneys' fees and costs and the Class Representatives' requested Service Awards;
8 and (5) setting a date and time for a Final Approval Hearing.

9 This Motion is based upon this Notice of Motion; the Memorandum of Points and Authorities in
10 Support hereof; the Declaration of Proposed Class Counsel William C. Jhaveri-Weeks; the Declaration
11 of Defense Counsel Linh Hua; the Declaration of Larry A. Lupo on behalf of Defendant; the Declaration
12 of Julie Green on behalf of proposed settlement administrator CPT Group, Inc.; the Declaration of Silvia
13 Argueta of proposed *cy pres* recipient Legal Aid Foundation of Los Angeles; the Proposed Order; the
14 pleadings and prior filings in this case; and such other documentary and oral evidence or argument as
15 may be presented to the Court at the hearing on this Motion.

16 Dated: April 19, 2024

Respectfully submitted,

18 THE JHAVERI-WEEKS FIRM, P.C.

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21 William C. Jhaveri-Weeks

22 Sarah Abraham

23 Ally N. Girouard

24 *Attorneys for Plaintiffs and the Putative Class*