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8 ALEXANDER VALLEJO

9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 ALEXANDER VALLEJO, individually and on
12 behalf of others similarly situated,

13 Plaintiff,

14 vs.

15 STERIGENICS U.S., LLC, a Delaware limited
16 liability company; and DOES 1 through 50,
inclusive,

17 Defendants.

Case No. 3:20-cv-01788-AJB-AHG

*Assigned for all purposes to the Hon.
Anthony J. Battaglia, and the Hon.
Magistrate Judge Allison H. Goddard*

**CLASS AND REPRESENTATIVE
ACTION**

**NOTICE OF PLAINTIFF'S MOTION
AND MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: August 24, 2023
Time: 2:00 p.m.
Ctrm: 4A

Complaint Filed: August 5, 2020
FAC Filed: July 14, 2021
SAC Filed: October 15, 2021
TAC Filed: January 6, 2021
Fourth Am. Cx. Filed: December 29, 2022
Trial date: None Set

1 **TO THE COURT AND ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE THAT** on August 24, 2023 at 2:00 p.m., or as soon thereafter as
3 the matter can be heard before the Honorable Anthony J. Battaglia in Courtroom 4A of the United
4 States District Court for the Southern District of California, located at 221 West Broadway, San Diego,
5 California 92101, Plaintiff Alexander Vallejo (“Plaintiff”) will, and hereby does, move the Court for
6 an order granting final approval of the class action settlement between Plaintiff and Defendant which
7 was preliminarily approved by this Court on April 20, 2023. (ECF. No. 87)

8 Specifically, Plaintiff respectfully requests that the Court issue an order: (i) granting final
9 approval of the Settlement¹; (ii) approving distribution of the Net Settlement Amount to Settlement
10 Class Members and the California Labor & Workforce Development Agency; (iii) approving Class
11 Counsel's attorneys' fees award of \$262,500.00 and Class Counsel's costs award of \$4,994.35; (iv)
12 approving Plaintiff's Class Representative's Payment of \$7,500.00; (v) and approving Settlement
13 Administration Costs of \$10,599.00 to ILYM Group, Inc. Plaintiff's motion is unopposed.
14

15 This motion is made pursuant to Rule 23(e) of the Federal Rules of Civil Procedure.

16 Plaintiff makes this Motion on the grounds that the Settlement is fair, adequate, and reasonable
17 and that all Class Members have been given the opportunity to participate in, opt-out of, or object to
18 the proposed Settlement. Only one Aggrieved Employees submitted a Request for Exclusion and
19 Objected to the PAGA Settlement. ILYM Decl. at ¶¶11-12.

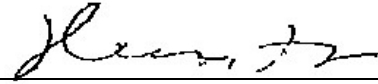
20 This motion is based upon this notice of motion and unopposed motion, the accompanying
21 memorandum of points and authorities in support of this motion, the declaration of Heather M. Davis,
22 and attached exhibits, the declaration of Nathalie Hernandez of ILYM Group, Inc. and attached
23 exhibits, such evidence and argument of counsel as may be presented at the hearing, and the complete
24 files and records in the above-captioned matter including, but not limited to: Plaintiff's Motion for
25 Attorneys' Fees and Costs, the accompanying memorandum of points and authorities, and the
26

27 ¹ A copy of the fully executed Settlement Agreement is attached as Exhibit 1 to the Declaration of
28 Heather Davis in Support of Plaintiff's Unopposed Motion for Preliminary Approval of Class Action
Settlement (“Davis Decl.”) (ECF 69-2).

1 declaration of Heather M. Davis and attached exhibits, and such additional matters as the Court may
2 consider.

3 DATED: July 27, 2023

PROTECTION LAW GROUP, LLP

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7 _____
8 Heather Davis
9 Amir Nayebdadash
10 Carlos Jimenez
11 *Attorneys for Plaintiff*
12 ALEXANDER VALLEJO
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