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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN DIEGO**

ROBERT SHANNON, BRENELL
WHITFIELD, and ADRIANA VALDEZ,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

BURTON RESTAURANTS, LLC; HIGH
PERFORMANCE HOSPITALITY LLC;
and DOES 1-20, inclusive,
Defendants.

CASE No. 37-2022-00025778-CU-OE-CTL

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND SERVICE
AWARDS**

Hearing Date: October 18, 2024
Hearing Time: 8:30 a.m.
[Hearing scheduled by Order dated April 18, 2024]

Judge: Hon. Blaine Bowman
Dept.: C-74

Action Filed: June 30, 2022
Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on October 18, 2024, or as soon thereafter
3 as the matter can be heard Department C-74 at the above-entitled Court before the Honorable Blaine
4 Bowman, Plaintiffs Robert Shannon, Brenell Whitfield, and Adriana Valdez ("Plaintiffs") will move for
5 an order granting (1) Final Approval of the Class Action Settlement, including approval of the attorneys'
6 fees, costs and service awards, and (2) Entry of the Final Approval Order and the Judgment.

7 This motion is brought in accordance with the Order dated April 18, 2024, and California Rules
8 of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities,
9 the Declaration of Norman Blumenthal, the Declaration of Jessica L. Campbell, the Class Action
10 Settlement Agreement and Release (the "Agreement"), the Declaration of Taylor Mitzner (the
11 Administrator), the Declarations of Plaintiffs Robert Shannon, Brenell Whitfield, and Adriana Valdez,
12 and the complete files and records in this action.

13 Because Plaintiffs and Defendants Burton Restaurants, LLC and High Performance Hospitality
14 LLC ("Defendants") have agreed to the proposed class settlement and have met and conferred regarding
15 the motion, this motion is not opposed. There have been no objections submitted by the Class.

16 Respectfully submitted,

17 Dated: September 25, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

19 By: /s/ Kyle Nordrehaug
20 Kyle R. Nordrehaug, Esq.
21 Attorneys for Plaintiffs
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