

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
John L. Nitti (State Bar #330752)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
jnitti@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Nicole Noursamadi (State Bar #357246)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
shani@zakaylaw.com
nicole@zakaylaw.com

Attorneys for Plaintiff STANLEY RENE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

STANLEY RENE, individually, and on
behalf of other members of the general
public similarly situated,

Plaintiff,

v.

KOCH FILTER CORPORATION, a
Kentucky corporation; and DOES 1 through
100, inclusive,

Defendant.

Case No. CVRI2300700

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

Date: January 30, 2025
Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp
Dept.: 1

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on January 30, 2025, or as soon
3 thereafter as the matter can be heard, in Department 1 of the above-entitled Court, before the
4 Honorable Judge Harold W. Hopp, Plaintiff Stanley Rene (“Plaintiff”) will apply for an order will
5 apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2)
6 Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated October
8 3, 2024, and California Rules of Court, rule 3.769. This Motion will be based on this Notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Claims
10 and Release of Claims (hereinafter collectively the “Agreement”), the Declaration of Sydney
11 Castillo-Johnson, Esq., the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude
12 Lapuyade, Esq., the Declaration of Joanna Ghosh, Esq., the Declaration of the Settlement
13 Administrator, the Declaration of the Plaintiff, and the complete files and records in this action.

14 The Court will make a tentative ruling on the merits of this matter by 3:00 p.m. on the
15 court day prior to the hearing. Tentative rulings will be available on the Internet or by calling 1-
16 760-904-5722. To view go to: <http://www.riverside.courts.ca.gov> and click on the tentative ruling
17 link. The tentative ruling shall become the ruling of the Court unless, by 4:30 p.m. on the court
18 day before the scheduled hearing, a party gives notice of intent to appear to all parties and the
19 court. The notice of intent to appear must be given either in person or by telephone. Where notice
20 of intent to appear has been properly given, or upon direction of the Court, oral argument will be
21 permitted.

22 Because all parties have agreed to the proposed class settlement and have met and
23 conferred regarding the motion, this motion is not opposed by Defendant. To date, there have
24 been no objections submitted by the Class.

25
26 Dated: January 7, 2025

Respectfully submitted,
JCL LAW FIRM, APC

27 By Sydney Castillo-Johnson
Sydney Castillo-Johnson, Esq.
28 Attorneys for Plaintiff