

JCL LAW FIRM, APC

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Attorneys for Plaintiff STANLEY RENE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

STANLEY RENE, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

KOCH FILTER CORPORATION, a Kentucky
corporation; and DOES 1-50, Inclusive;

Defendants.

Case No. CVRI2300700

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

Date: October 3, 2024

Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept.: 1

Reservation #: 972551561962

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on October 3, 2024, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 1 of the Riverside Superior Court, the Honorable Judge Harold W. Hopp
4 presiding, Plaintiff STANLEY RENE will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
6 and PAGA Claims and Release of Claims (“Agreement”) attached as Exhibit A to the Declaration of
7 Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement,
10 Exclusion Form, Objection Form, and Final Hearing Date to the Settlement Class;

11 4. Appoint Plaintiff Stanley Rene as the Class Representative;

12 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Lawyers for Justice,
13 P.C. as Class Counsel; and

14 6. Set a hearing date for final approval of the settlement.

15 7. This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points
16 and Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement;
17 (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5)
18 the Declaration of Joanna Ghosh; (6) the Declaration of the Plaintiff; (7) the Stipulation of Settlement
19 of Class and PAGA Action Claims and Release of Claims and exhibit attached thereto; (8) the
20 [Proposed] Order Granting Preliminary Approval of Class and PAGA Action Settlement and exhibits
21 attached thereto; (9) the records, pleadings, and papers filed in this action; and (10) upon such other
22 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
23 of this Motion.

24 8. The Court will make a tentative ruling on the merits of this matter by 3:00 p.m. on the
25 court day prior to the hearing. Tentative rulings will be available on the Internet or by calling 1-760-
26 904-5722. To view go to: <http://www.riverside.courts.ca.gov> and click on the tentative ruling link. The
27 tentative ruling shall become the ruling of the Court unless, by 4:30 p.m. on the court day before the
28 scheduled hearing, a party gives notice of intent to appear to all parties and the court. The notice of

1 intent to appear must be given either in person or by telephone. Where notice of intent to appear has
2 been properly given, or upon direction of the Court, oral argument will be permitted.

3 As this Motion is unopposed, the Parties respectfully request relief from the page limit
4 requirement set by California Rules of Court, Rule 3.1113(d).

5
6 Dated: September 10, 2024

JCL LAW FIRM, APC

7 By: Sydney Castillo-Johnson
8 Sydney Castillo-Johnson
9 Attorneys for Plaintiff
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Court Reservation Receipt

Reservation	
Reservation ID: 972551561962	Status: RESERVED
Reservation Type: Motion for Preliminary Approval of Class Action Settlement	Number of Motions: 1
Case Number: CVRI2300700	Case Title: RENE vs KOCH FILTER CORPORATION
Filing Party: STANLEY RENE (Plaintiff)	Location: Historic Court House - Department 1
Date/Time: October 3rd 2024, 8:30AM	Confirmation Code: CR-UCPVEEPAZOU5QWUBU

Fees			
Description	Fee	Qty	Amount
Motion for Preliminary Approval of Class Action Settlement	0.00	1	0.00
TOTAL			\$0.00

Payment	
Amount: \$0.00	Type: NOFEE

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