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Attorneys for Plaintiff Kathryn Jeanine Fagan Engles

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

KATHRYN JEANINE FAGAN ENGLES, as an
individual, on behalf of herself, and all persons
similarly situated,

Plaintiff,

v.

PREMIUM BRANDS OPCO LLC, an Ohio
limited liability company authorized to do
business in California; and DOES 1 through 50
inclusive,

Defendant.

Case No.: 30-2023-01319973-CU-OE-CXC

CLASS AND REPRESENTATIVE ACTION

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

[Filed concurrently with Memorandum of Points
and Authorities, Declaration of James R.
Hawkins, and [Proposed] Order]

Reservation No.: 74415702

Date: March 14, 2025
Time: 10:00 a.m.
Dept.: Dept. CX105
Judge: Hon. Randall J. Sherman

Trial Date: None set
Complaint filed: April 18, 2023

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 14, 2025, at 10:00 a.m., or as soon thereafter as this matter may be heard in Department CX105 of the Orange County Superior Court, located at 751 W. Santa Ana Blvd., Santa Ana, CA 92701, Plaintiff Kathryn Jeanine Fagan Engles (“Plaintiff”), by and through her counsel of record, will and hereby do, move the Court for an order:

1. Provisionally certifying the Settlement Class for settlement purposes only;
2. Granting preliminary approval of the Settlement reached in this matter;
3. Approving as to form and content the Notice of Proposed Class Action and PAGA Settlement and ordering that the Notice of Proposed Class Action and PAGA Settlement be distributed to all Class Members;
4. Appointing Named Plaintiff Kathryn Jeanine Fagan Engles as the Class Representative;
5. Appointing CPT Group, Inc. as the Settlement Administrator;
6. Appointing James Hawkins APLC as Class Counsel; and
7. Setting this matter for a hearing on the issues of final approval of the proposed Settlement, approval of the Class Representative Incentive Payment, approval of Class Counsel’s Fees and Costs, approval of the PAGA Allocation, and approval of the Administration Expenses.

This motion is brought pursuant to rule 3.769 of the California Rules of Court and Labor Code section 2699(l)(2) on the grounds that the proposed Settlement was reached as a result of informed arm’s-length negotiations and is within the range of reasonableness to be finally approved as fair, adequate, and reasonable in all respects.

Plaintiff’s motion is based upon this Notice, the accompanying Memorandum of Points and Authorities, the parties’ Class Action and PAGA Representative Action Settlement Agreement, the declaration of James R. Hawkins, the accompanying exhibits, which are filed and served concurrently ///

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2 with this motion, all pleadings and papers filed in this action, and upon any such other evidence or
3 argument that may be presented to the Court at the time of the hearing.

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5 Dated: October 30, 2024

JAMES HAWKINS APLC

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7 By: _____


James R. Hawkins
Christina M. Lucio
Mitchell J. Murray

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9 Attorneys for Plaintiff
10 Kathryn Jeanine Fagan Engles
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