

1 BRANDON BROUILLETTE  
brandon@crosnerlegal.com  
2 ZACHARY M. CROSNER (SBN 272295)  
Zach@crosnerlegal.com  
3 JAMIE SERB (SBN 289601)  
jamie@crosnerlegal.com  
4 **CROSNER LEGAL, P.C.**  
9440 Santa Monica Blvd., Suite 301  
5 Beverly Hills, CA 90210  
Telephone: 866-276-7637  
6 Facsimile: 310-510-6429

7 Attorneys for Plaintiffs Eliseo De La Torre,  
Jose Noriega, Nicasio Andrade, and Mario  
8 Castro

9  
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF SAN DIEGO**

12 ELISEO DE LA TORRE, JOSE NORIEGA,  
13 NICASIO ANDRADE, and MARIO CASTRO,  
14 individually and on behalf of all similarly-  
situated employees,

15 Plaintiffs,

16 v.

17 and

18 UNIQUE BUILDING GROUP, INC., and DOES  
19 1 through 100, inclusive,

20 Defendants.  
21  
22  
23  
24  
25  
26  
27  
28

Case No.: 37-2023- 00011128-CU-OT-CTL

Assigned for All Purposes to:  
Hon. Matthew C. Braner  
Dept. C-60

**NOTICE OF MOTION AND MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT AND REQUEST  
FOR ATTORNEY'S FEES AND COSTS**

[Filed concurrently with: Memorandum of  
Points and Authorities; Declarations of  
Brandon Brouillette and Taylor Mitzner;  
[Proposed] Order]

Date: November 8, 2024  
Time: 9:00 a.m.  
Department: C-60

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

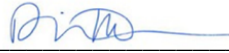
2 PLEASE TAKE NOTICE that on November 8, 2024, at 9:00 a.m., in Department C-60  
3 of the above-captioned Court, located at 330 West Broadway, San Diego, California, plaintiffs  
4 Eliseo De La Torre, Jose Noriega, Nicasio Andrade, and Mario Castro, on behalf of themselves and  
5 the conditionally certified settlement class, will and hereby do move the Court for an order  
6 granting final approval of the proposed class action settlement, approving the payment of civil  
7 penalties, approving the class representative service payment provided for the class action  
8 settlement, and approving payment of the Settlement Administrator's fees and expenses.  
9 Plaintiff also will and hereby does move the Court for an order granting an award of attorney's  
10 fees in the amount of \$233,333.00 (33.33% of the gross settlement amount) and costs in the  
11 amount of \$15,569.46, as provided in the proposed class action settlement.

12 This motion is brought under California Rule of Court 3.769, on the grounds that the  
13 settlement is fair, reasonable and adequate and in the best interests of the class, and meets all  
14 requirements for class certification. The requested class representative service payment is fair  
15 and reasonable under the circumstances of the case. The requested attorney's fees and costs are  
16 fair and reasonable under the circumstances of the case.

17 This motion will be based on this Notice of Motion and Motion, the accompanying  
18 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying  
19 Declarations of Brandon Brouillette and Taylor Mitzner, the Court's entire file herein, and on  
20 such further evidence and argument as may be presented at the hearing.

21 Dated: October 16, 2024

**CROSNER LEGAL, PC**

22  
23 By:   
24 Brandon Brouillette, Esq.

25 Jamie Serb, Esq.

26 Zachary Crosner, Esq.

27 Attorneys for Plaintiffs Eliseo De La Torre, Jose Noriega,  
28 Nicasio Andrade, and Mario Castro