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13 Attorneys for Plaintiff
14 SANTOS MARTINEZ PADILLA

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF RIVERSIDE**
17

18 PEDRO CEDENO, as an individual on behalf
19 of himself and on behalf of all others similarly
20 situated,

21 Plaintiff,

22 vs.

23 SANNIPOLI CORPORATION, a
California Corporation; MATTHEWS
INTERNATIONAL CORPORATION, a
24 Pennsylvania Corporation; THE YORK
GROUP, INC., a Delaware Corporation; and
25 DOES 1-100, inclusive,

26 Defendants.

) Lead Case No. CVRI2303826
)
) [Consolidated with Case Nos. CVRI2304132;
) CVRI2304915; and CVRI2306853]
)
) Assigned for All Purposes To:
) Judge: Harold W. Hopp
) Dept: 1
)
) **NOTICE OF MOTION AND MOTION**
) **FOR FINAL APPROVAL OF CLASS**
) **ACTION SETTLEMENT AND REQUEST**
) **FOR ATTORNEY'S FEES AND COSTS**

Date: January 15, 2025
Time: 8:30 a.m.
Dept. 1

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

2 **PLEASE TAKE NOTICE THAT** that on January 15, 2025, at 8:30 a.m. or as soon
3 thereafter as the matter may be heard, in Department 1 of the above-captioned Court, located at
4 4050 Main Street, Riverside, California, plaintiffs Pedro Ceden0 and Santos Martinez Padilla, on
5 behalf of themselves and the conditionally certified settlement class, will and hereby do move the
6 Court for an order granting final approval of the proposed class action settlement, approving the
7 payment of civil penalties, approving the class representative service payment provided for the
8 class action settlement, and approving payment of the Settlement Administrator's fees and
9 expenses. Plaintiffs also will and hereby do move the Court for an order granting an award of
10 attorney's fees in the amount of \$300,000 (1/3 of the gross settlement amount) and costs in the
11 amount of \$22,259.19, 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 payments are fair
15 and reasonable under the circumstances of the case. The requested attorney's fees and costs are fair
16 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 Declarations
19 of Chad Saunders, Kyle Nordrehaug, Pedro Ceden0, Santos Martinez Padilla, and Madely Nava, the
20 Court's entire file herein, and on such further evidence and argument as may be presented at the
21 hearing.

22
23 Dated: December 19, 2024

CROSNER LEGAL, PC

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26 By: 
27 Chad Saunders, Esq.
28 Brandon Brouillette, Esq.
Zachary M. Crosner, Esq.
Attorneys for Plaintiff
PEDRO CEDENO

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DATED: December 19, 2024

BLUMENTHAL NORDREHAUG
BHOWMIK DE BLOUW LLP

By: _____

Norman B. Blumenthal
Kyle R. Nordrehaug
Aparajit Bhowmik
Nicholas J. De Blouw
Attorneys for Plaintiff Santos Martinez Padilla