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Attorneys for Plaintiff DANIELLA MARQUEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

DANIELLA MARQUEZ, as an individual
on behalf of herself and on behalf of all
others similarly situated,

Plaintiff,

vs.

S & G DISCOUNT OUTLET, INC., a
California Corporation; and DOES 1-100,
inclusive,

Defendants.

Case No.: 23CV005687

Assigned for All Purposes to:
Hon. Hon. Jill H. Talley
Dept. 23

**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 Nikki Trenner and
Madely Nava; [Proposed] Order]

Date: January 10, 2025
Time: 9:00 a.m.
Dept. 23

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on January 10, 2025, at 9:00 a.m., or as soon thereafter as
3 the matter may be heard, in Department 23 of the above-captioned Court, located at the Gordon
4 D. Schaber Courthouse, 720 9th Street, Sacramento, California, plaintiff Daniella Marquez, on
5 behalf of herself and the conditionally certified settlement class, will and hereby does 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. Plaintiff also will and hereby does move the Court for an order granting an award of
10 attorney's fees in the amount of \$123,333.00 (33.33% of the escalated gross settlement amount)
11 and costs in the amount of \$8,952.32, 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 and
15 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 The motion will be based upon this notice of motion and motion, the accompanying
18 memorandum of points and authorities, declarations of Nikki Trenner and Madely Nava, the
19 Settlement Agreement, the Court's entire file herein, and on such other argument and evidence
20 as the Court may entertain at the hearing on this motion.

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1 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of
2 this matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative
3 rulings for the department may be downloaded off the court's website. If the party does not have
4 online access, they may call the dedicated phone number for the department as referenced in the
5 local telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before
6 the hearing and receive the tentative ruling. If you do not call the court and the opposing party by
7 4:00 p.m. the court day before the hearing, no hearing will be held.

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9 Dated: December 26, 2024

CROSNER LEGAL, P.C.

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11 By: 
12 Jamie K. Serb
13 Nikki Trenner
14 Zachary M. Crosner
15 Attorneys for Plaintiff Daniella Marquez
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