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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

MICHAEL TURINETTI, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

v.

GEMOLOGICAL INSTITUTE OF
AMERICA, INC., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 37-2023-00036003-CU-OE-CTL

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

Date: August 28, 2026
Time: 10:30 a.m.

Judge: Hon. Loren Freestone
Dept.: C-64

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on August 28, 2026, or as soon thereafter as the matter can be heard, in Department C-64 of the above-entitled Court, before the Honorable Judge Loren Freestone, Plaintiff Michael Turinetti (“Plaintiff”) will apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final Approval Order and Judgment.

This Motion is brought in accordance with the Preliminary Approval Order dated April 7, 2026, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, Class Action and PAGA Settlement Agreement and Class Notice (“Agreement”)¹, the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Yasmin Hosseini, the Declaration of Tarus Dancy (the Administrator), the Declaration of Plaintiff Michael Turinetti, the Proposed Order, Proposed Judgment, and the complete files and records in this action.

Because all parties have agreed to the proposed class settlement and have met and conferred regarding the motion, this motion is not opposed by Defendant. To date, there have been no objections submitted by the Class.

Respectfully submitted,

Dated: August 6, 2026

ZAKAY LAW FIRM, APLC

By: Nicole Noursamadi
Nicole Noursamadi, Esq.
Attorney for PLAINTIFF

¹ The Agreement is attached as Ex “A” to the Declaration of Shani O. Zakay (“SOZ Dec.”) at ¶ 3. All citations to the Agreement incorporate by this reference a citation to the SOZ Dec. Further, unless indicated otherwise, capitalized terms used herein have the same meaning as those defined by the Agreement.