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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

ELIJAH WOLDEMARIAM, individually,  
and on behalf of other members of the  
general public similarly situated;

Plaintiff,

v.

ALL NIPPON AIRWAYS CO., LTD., a  
Japanese corporation; and DOES 1 through  
100, inclusive,

Defendants.

Case No. 23STCV29685

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

Date: September 18, 2026  
Time: 10:30 a.m.

Dept.: 1

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on September 18, 2026, or as soon  
3 thereafter as the matter can be heard, in Department 1 of the above-entitled Court, Plaintiff  
4 ELIJAH WOLDEMARIAM (“Plaintiff”) will apply for an order granting (1) Final Approval of  
5 the Class Action and PAGA Settlement, and (2) Entry of the Final Approval Order and Judgment.

6 This Motion is brought in accordance with the Preliminary Approval Order dated June 24,  
7 2026, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the  
8 accompanying points and authorities, the Class Action and PAGA Settlement Agreement  
9 (hereinafter, “Agreement”), the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of  
10 Shani O. Zakay, Esq., the Declaration of Selena Matavosian, Esq., the Declaration of Norma  
11 Ayala (the Administrator), the Declaration of the Plaintiff, and the complete files and records in  
12 this action.

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

16  
17 Dated: August 24, 2026

Respectfully submitted,  
**ZAKAY LAW GROUP, APLC**

18 By: /s/ Nicole Noursamadi  
19 Nicole Noursamadi, Esq.  
20 Attorney for Plaintiff  
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