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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ALEXIS BARTRAM and LOURDES
CONTRERAS, individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

v.

LAKESHORE LEARNING MATERIALS,
LLC, a California limited liability company;
and DOES 1-50, Inclusive,

Defendant.

Case No.: 23STCV21174

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

Date: July 3, 2025

Time: 9:00 a.m.

Judge: Hon. Laura A. Seigle

Dept.: 17

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on July 3, 2025, or as soon thereafter
3 as the matter can be heard, in Department 17 of the above-entitled Court, before the Honorable
4 Judge Laura A. Seigle, Plaintiffs ALEXIS BARTRAM and LOURDES CONTRERAS
5 (“Plaintiffs”) will apply for an order will apply for an order granting (1) Final Approval of the Class
6 Action and PAGA Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated March 5,
8 2025, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Class Action and PAGA Settlement Agreement
10 (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-
11 Claude Lapuyade, Esq., the Declaration of William C. Sung, Esq., the Declaration of the Settlement
12 Administrator, the Declaration of Alexis Bartram, the Declaration of Lourdes Contreras, and the
13 complete files and records in this action.

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

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18 Dated: June 10, 2025

JCL LAW FIRM, APC

19 By: Sydney Castillo-Johnson
20 Sydney Castillo-Johnson, Esq.
21 Attorneys for PLAINTIFF
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