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6 Attorneys for Plaintiff BIANCA MURO,
7 on behalf of herself and all others similarly situated
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11 BIANCA MURO, individually and on behalf of
12 herself and all other similarly situated,

13 Plaintiff,

14 v.

15 MICHAEL KORS, INC., a Delaware
corporation; BARRETT BUSINESS
16 SERVICES, INC., a Maryland corporation, and
DOES 1 – 50, inclusive,

17 Defendants.
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Case No. 23STCV21214 (Lead Case)
Consolidated with 23STCV27448

Assigned to Hon. Lawrence P. Riff

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

Date: April 1, 2025 _____
Time: 10:00 a.m.
Dept.: 7

Complaint Filed: September 1, 2023
Trial Date: None Yet Set

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 1, 2025 at 10:00 a.m., or as soon thereafter as this matter may be heard in Department 7 of the Los Angeles County Superior Court, located at 312 N Spring St, Los Angeles, CA 90012, Named Plaintiff Bianca Muro (“Named Plaintiff”), by and through her counsel of record, will and hereby do, move the Court for an order:

1. Provisionally certifying the Class for settlement purposes only;
2. Granting preliminary approval of the Joint Stipulation of Settlement and Release (“Settlement Agreement”);
3. Approving as to form the Notice of Settlement of Class Action and Final Approval Hearing (“Class Notice”) and ordering that the Class Notice be distributed to all Class Members;
4. Appointing named Plaintiff Bianca Muro as the Class Representative;
5. Appointing Apex Class Action Administrators as the Settlement Administrator;
6. Appointing James R. Hawkins, Christina M. Lucio, and Mitchell J. Murray of James Hawkins APLC as Class Counsel; and
7. Setting this matter for a hearing on the issues of final approval of the proposed Settlement, approval of the Class Representative Service Award, approval of the Class Counsel’s Fees and Costs Award, approval of the PAGA Payment, and approval of the Administration Costs.

This motion is brought pursuant to rule 3.769 of the California Rules of Court and Labor Code section 2699(l)(2) on the grounds that the proposed Settlement Agreement was reached as a result of informed arm’s-length negotiations and is within the range of reasonableness to be finally approved as fair, adequate, and reasonable in all respects.

This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points and Authorities in support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3) the Declarations of James R. Hawkins; (4) the Settlement Agreement, attached as Exhibit 1 to the Declaration of James R. Hawkins; (5) the Class Notice (6) the Declaration of Plaintiff Bianca Muro; (7) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement; (8) the records, pleadings, and papers filed in this action; and (9) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

As this Motion is unopposed, Plaintiff respectfully requests relief from the page limit requirement set by California Rules of Court, Rule 3.1113(d).

Dated: : January 30, 2025

JAMES HAWKINS APLC

By: _____

James R. Hawkins
Christina M. Lucio
Mitchell J. Murray

Attorneys for Plaintiff Bianca Muro