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Attorneys for Plaintiff JOSE BARAJAS, on behalf of himself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

JOSE BARAJAS on behalf of himself, all
others similarly situated, and on behalf of
the general public,

Plaintiffs,

v.

BENNETT ENTERPRISES, A
CALIFORNIA LANDSCAPE
CONTRACTING CORPORATION; and
DOES 1-100,

Defendants.

Case No. 24STCV12791

*[Assigned for All Purposes to the
Hon. Carolyn B. Kuhl; Dept. 12]*

**PLAINTIFF JOSE BARAJAS' NOTICE OF
HIS MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT, CONDITIONAL
CERTIFICATION, APPROVAL OF CLASS
NOTICE, SETTING OF FINAL APPROVAL
HEARING DATE**

Date: March 16, 2025

Time: 10:30 a.m.

Complaint Filed: May 21, 2024

Trial Date: None Set

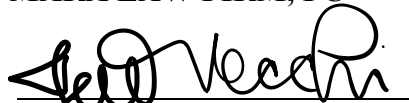
1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on March 16, 2025, at 10:30 a.m., or as soon thereafter as
3 the matter can be heard, in Department 12 of the Los Angeles County Superior Court, located at
4 312 North Spring Street, Los Angeles, California 90012, before the Honorable Carolyn B. Kuhl,
5 Plaintiff Jose Barajas will move the Court for Preliminary Approval of Class and PAGA Action
6 Settlement, Conditional Certification, Approval of Class Notice, and Setting of Final Approval
7 Hearing Date.

8 This motion will be based on this Notice, the Memorandum of Points and Authorities in
9 Support, the Declaration of David Mara, Esq., the Declaration of Plaintiff Jose Barajas, the
10 Declaration of Sean Hartranft on Behalf of APEX, Declaration of Gregg A. Fisch, Esq., and any
11 and all documents filed in this matter, and any oral argument that may be presented at the hearing,
12 and upon such other matters as this Court may consider.

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14 Dated: December 22, 2025

MARA LAW FIRM, PC

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16 David Mara, Esq.

17 Jill Vecchi, Esq.

18 Attorneys for Plaintiff Jose Barajas on behalf of
19 himself, all others similarly situated, and on behalf of
20 the general public
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