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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JUSTIN CABATIT, an individual, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiffs,

vs.

PROSCIENTO, INC., a Delaware corporation;
PROSCIENTO CLINICAL RESEARCH
VENTURES, INC., a Delaware corporation;
and DOES 1-50, Inclusive,

Defendants.

Case No. 37-2023-00051828-CU-OE-CTL

Action Filed: November 30, 2023

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

Date: September 25, 2025
Time: 10:15 a.m.

Judge: Hon. Wendy M. Behan
Department: C-66

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:15 a.m. on September 25, 2025, or as soon
3 thereafter as the matter can be heard, in Department C-66 of the above-entitled Court, before the
4 Honorable Judge Wendy M. Behan, Plaintiff JUSTIN CABATIT (“Plaintiff”) will apply for an
5 order granting (1) Final Approval of the Class Action and PAGA Settlement, (2) Class Counsel
6 Award and Service Award, and (3) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated May 2,
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 Stipulation of Settlement of Class and PAGA Action
10 Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Jackland K Hom,
11 the Declaration of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the Declaration of
12 the Plaintiff, the Declaration of the Settlement Administrator, and the complete files and records in
13 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 Defendants. To date, there have been no
16 objections submitted by the Class.

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

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Dated: August 28, 2025

Respectfully submitted,
ZAKAY LAW GROUP, APLC

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By: Nicole Noursamadi
Nicole Noursamadi, Esq.

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Attorney for Plaintiff

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