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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF NEVADA

TIFFANY BRITTON and KAYJHONNIE
SMITH, individually, and on behalf of other
members of the general public similarly
situated,

Plaintiffs,

vs.

MOUNTAIN VALLEY CHILD AND
FAMILY SERVICES, INC., a California
Corporation; and DOES 1 through 100,
Inclusive,

Defendants.

Case No. CU0000023

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

Date: January 19, 2024

Time: 10:00 a.m.

Judge: Hon. S. Robert Tice-Raskin
Dept.: 6

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on January 19, 2024, or as soon
3 thereafter as the matter can be heard, in Department 6 of the above-entitled Court, before the
4 Honorable Judge S. Robert Tice-Raskin, Plaintiffs TIFFANY BRITTON and KAYJHONNIE
5 SMITH (“Plaintiffs”) will apply for an order granting (1) Final Approval of the Class Action and
6 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 October
8 13, 2023, 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 Shani O. Zakay,
11 the Declaration of Jean-Claude Lapuyade, the Declaration of Edwin Aiwazian, the Declarations of
12 the Plaintiffs, and the complete files and records in this action.

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

16 Respectfully submitted,

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18 Dated: December 21, 2023

JCL LAW FIRM, APC

19 By: 
20 Jean-Claude Lapuyade, Esq.
21 Attorneys for Plaintiff
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