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Attorneys for ROYA NOORI and PAOLA OLIVO, on behalf of themselves,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

ROYA NOORI and PAOLA OLIVO on
behalf of themselves, all others similarly
situated, and on behalf of the general
public,

Plaintiffs,

v.

VISTA COMMUNITY CLINIC; and
DOES 1-100,

Defendants.

Case No.: 37-2023-00000144-CU-OE-CTL
(Consolidated with Case No.
37-2023-00005665-CU-OE-CTL)

*[Assigned for All Purposes to the
Honorable James A. Mangione; Dept. C-75]*

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

Date: September 13, 2024
Time: 9:00 a.m.

Complaint Filed: January 3, 2023
Trial Date: None Set

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

2 **PLEASE TAKE NOTICE** that on September 13, 2024 at 9:00 a.m., or as soon thereafter
3 as the matter can be heard, in Department C-75 of the San Diego County Superior Court, located
4 at 330 W Broadway, San Diego, California 92101, before the Honorable James A. Mangione,
5 Plaintiffs Roya Noori and Paola Olivo will move the Court for Preliminary Approval of Class
6 Action Settlement, Conditional Certification, Approval of Class Notice, and Setting of Final
7 Approval Hearing Date.

8 This motion will be based on this Notice, the Memorandum of Points and Authorities, the
9 Declarations of David Mara, Esq., and Douglas Han, Esq., any and all documents filed in this
10 matter, and any argument that may be presented at the hearing, and upon such other matters as
11 this Court may consider.

12 **MARA LAW FIRM, PC**

13 Date: August 19, 2024

Signed: /s/ David Mara

David Mara, Esq.

Jill Vecchi, Esq.

Attorneys for Plaintiffs

16 **JUSTICE LAW CORPORATION**

17 Date: August 19, 2024

Signed: /s/ Douglas Han

Douglas Han, Esq.

Shunt Tatavos-Gharajeh, Esq.

Attorneys for Plaintiffs