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Attorneys for Plaintiff MIRANDA LOPEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

MIRANDA LOPEZ, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

BEHAVIOR FRONTIERS, LLC, a California
limited liability company; and DOES 1
through 100, inclusive,

Defendants.

Case No. 22STCV15331

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

Date: October 6, 2023

Time: 11:00 a.m.

Judge: Hon. Elihu M. Berle

Dept.: 6

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on October 6, 2023, at 11:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 6 of the Los Angeles Superior Court, the Honorable Judge Elihu
4 M. Berle presiding, plaintiff MIRANDA LOPEZ will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action and PAGA
6 Settlement Agreement and Class Notice ("Agreement") attached as Exhibit A to the Declaration of
7 Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Class Action Settlement to the
10 Settlement Class;

11 4. Appoint Plaintiff MIRANDA LOPEZ as the Class Representative;

12 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Lawyers for Justice,
13 PC, as Class Counsel; and

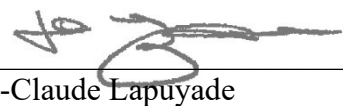
14 7. Set a hearing date for final approval of the settlement.

15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
17 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 forthcoming Declaration of Miranda Lopez; (6) the Class Action and PAGA Settlement Agreement
19 and exhibit attached thereto; (7) the [Proposed] Order Granting Preliminary Approval of Class Action
20 and PAGA Settlement and exhibits attached thereto; (8) the records, pleadings, and papers filed in this
21 action; and (9) upon such other documentary and oral evidence or argument as may be presented to
22 the Court at or prior to the hearing of this Motion.

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

25 Dated: August 31, 2023

JCL LAW FIRM, APC

26 By: 
27 Jean-Claude Lapuyade
28 Attorneys for Plaintiff

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