

JCL LAW FIRM, APC

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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
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

Date: April 9, 2024
Time: 9:00 a.m.

Judge: Hon. Elihu M. Berle
Dept.: 6

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on April 9, 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 Elihu M. Berle, Plaintiff MIRANDA LOPEZ (“Plaintiff”) will apply for an
5 order will apply for an order granting (1) Final Approval of the Class Action and PAGA
6 Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated
8 December 11, 2023, and California Rules of Court, rule 3.769. This Motion will be based on this
9 notice, the accompanying points and authorities, the Class Action and PAGA Settlement
10 Agreement (“Agreement”), the Declaration of Jean-Claude Lapuyade, the Declaration of Shani O.
11 Zakay, the Declaration of Joanna Ghosh, the Declaration of Madely Nava (the Administrator), the
12 Declaration of the Plaintiff, and the complete files and records in this action.

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

16 Respectfully submitted,

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18 Dated: February 5, 2024

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19 By: Perssia Razma
20 Perssia Razma, Esq.
21 Attorneys for Plaintiff
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