

JCL LAW FIRM, APC

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Attorneys for PLAINTIFF RICHARD WINN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

RICHARD WINN, an individual, on behalf
of himself and on behalf of all persons
similarly situated,

Plaintiff,

v.

CITY ELECTRIC SUPPLY COMPANY, a
Florida corporation; and DOES 1-50,
Inclusive,

Defendant.

Case No. 37-2023-00040231-CU-OE-CTL

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

Date: March 28, 2025
Time: 9:00 a.m.

Judge: Hon. James A. Mangione
Dept.: C-75

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on March 28, 2025, or as soon
3 thereafter as the matter can be heard, in Department C-75 of the above-entitled Court, before the
4 Honorable Judge James A. Mangione, Plaintiff RICHARD WINN (“Plaintiff”) will apply for an
5 order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the
6 Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated October
8 11, 2024, 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 Katherine Rovertoni (the Settlement
12 Administrator), the Declaration of Richard Winn, 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, Defendant does not oppose this motion. To date, there have been
15 no objections submitted by the Class.

16 Respectfully submitted,

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18 DATED: March 6, 2025

JCL LAW FIRM, APC

19 By: Sydney Castillo-Johnson
20 Sydney Castillo-Johnson, Esq.
21 Attorney for Plaintiff
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