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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

BRITNEY CLARKE and DOMINIQUE
BOWIE, individuals, and on behalf of other
members of the general public similarly
situated;

Plaintiff,

vs.

ST ANNES MATERNITY HOME, an
unknown business entity; ST. ANNE'S
MATERNITY HOME, an unknown business
entity; ST. ANNE'S FOUNDATION, a
California corporation; ST. ANNE'S
FAMILY SERVICES, a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 22STCV14674

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

Hearing Date: February 7, 2024

Hearing Time: 10:30 a.m.

Judge: Hon. Stuart M. Rice

Department: 1

TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on February 7, 2024 or as soon thereafter as the matter can be heard, in Department 1 of the above entitled Court, before the Honorable Judge Stuart M. Rice, Plaintiffs BRITNEY CLARKE and DOMINIQUE BOWIE (“Plaintiffs”) will apply for an order (1) preliminary approving the proposed settlement of this class action with Defendants ST ANNES MATERNITY HOME, MATERNITY HOME, ST. ANNE’S FOUNDATION, and ST. ANNE’S FAMILY SERVICES (“Defendants”); (2) approving the form and method for providing class-wide notice; (3) directing that notice of the proposed settlement be given to the class; and (4) scheduling a final approving hearing date to consider Plaintiffs’ motion for final approval of the settlement and entry of the Judgment, and Plaintiffs’ motion for approval of attorneys’ fees and litigation expenses.

This motion for preliminary approval of the class settlement is brought pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of motion and motion, the accompanying points and authorities, the Declaration of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the Declaration of Britney Clarke, the Declaration of Dominique Bowie, Declaration of Vartan Madoyan, the Declaration of Sean Hartranft of APEX Class Action, the Class Action and PAGA Settlement Agreement and Class Notice (“Agreement”) between the parties, and the complete files and records in this action. All parties have agreed to the proposed class settlement and have met and conferred regarding the motion; therefore, this motion is not opposed by Defendants.

DATED: January 12, 2024

Respectfully submitted,
JCL LAW FIRM, APC
ZAKAY LAW GROUP, APLC

By: 
Monnett De La Torre
Jean-Claude Lapuyade
Shani O. Zakay

Attorneys for Plaintiffs