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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

REBECCA RIVERA, an individual, on behalf
of herself, and on behalf of all persons similarly
situated,

Plaintiff,

vs.

EUREKA CENTER EMPLOYEES, LLC, a
Delaware limited liability company; EUREKA
REALTY PARTNERS, INC., a California
corporation; CRAIG REALTY GROUP –
CABAZON, LLC, a California limited liability
company; CRAIG REALTY GROUP –
TULARE, LLC, a California limited liability
company; CRAIG REALTY GROUP –
CABAZON PHASE II, LLC, a California
limited liability company; CRAIG REALTY
GROUP CITADEL, LLC, a Delaware limited
liability company; CRAIG REALTY GROUP-

Case No. CIVSB2308152

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

Date: September 18, 2025
Time: 1:30 p.m.

Judge: Hon. Joseph T. Ortiz
Dept.: S-17

SAN CLEMENTE, LLC, a California limited liability company; and DOES 1-50, Inclusive,
Defendants.

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TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on September 18, 2025, or as soon thereafter as the matter can be heard, in Department S-17 of the above-entitled Court, before the Honorable Judge Joseph T. Ortiz, Plaintiff Rebecca Rivera (“Plaintiff”) will apply for an order will apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final Approval Order and Judgment.

This Motion is brought in accordance with the Preliminary Approval Order dated April 25, 2025, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Sydney Castillo-Johnson, Esq., the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Settlement Administrator, the Declaration of the Plaintiff, and the complete files and records in this action.

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

Dated: August 21, 2025

Respectfully submitted,

JCL LAW FIRM, APC

By: Sydney Castillo-Johnson
Sydney Castillo-Johnson, Esq.
Attorneys for PLAINTIFF