

JCL LAW FIRM, APC

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Attorneys for Plaintiff MANUEL DIAZ NUNEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TULARE

MANUEL DIAZ NUNEZ, an individual, on
behalf of himself and on behalf of all persons
similarly situated,

Plaintiff,

v.

TITAN AG SERVICES, INC., a California
Corporation; ROYAL FARMS, INC., a
California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. VCU296822

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

Date: January 28, 2025
Time: 8:30 a.m.

Judge: Hon. Bret D. Hilman
Dept.: 2

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on January 28, 2025, or as soon
3 thereafter as the matter can be heard, in Department 2 of the above-entitled Court, before the
4 Honorable Judge Bret D. Hilman, Plaintiff Manuel Diaz Nunez (“Plaintiff”) will apply for an order
5 granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final
6 Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated July 16,
8 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 Action and PAGA
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 Tatiana Hernandez, the Declaration
12 of the Settlement Administrator, the Declaration of the Plaintiff, and the complete files and records
13 in this action.

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

17 Respectfully submitted,

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19 Dated: December 19, 2024

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20 By: Sydney Castillo-Johnson
Sydney Castillo-Johnson, Esq.

21 Attorneys for PLAINTIFF
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