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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SISKIYOU

DEANNA RICKETTS, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

MOUNTAIN SILVERADO, INC., a California
corporation; DENNIS R. ERICKSON, an
individual; and DOES 1 through 50, Inclusive,

Defendants.

Case No.: 22CV00796

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

Date: February 20, 2025
Time: 9:30 a.m.

Judge: Hon. Karen L. Dixon
Dept.: 2

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on February 20, 2025, or as soon thereafter as the matter can be heard, in Department 2 of the above-entitled Court, before the Honorable Judge Karen L. Dixon, Plaintiff DEANNA RICKETTS (“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 September 26, 2024, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, the Class Action and PAGA Settlement Agreement (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of the Settlement Administrator, the Declaration of 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 Defendants. To date, there have been no objections submitted by the Class.

Respectfully submitted,

Dated: January 24, 2025

ZAKAY LAW GROUP, APLC

By: Rachel Newman
Rachel Newman, Esq.
Attorneys for Plaintiff