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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

JOHN KNEISLY, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

S R MACHINING, INC., a California
Corporation; S R MACHINING-
PROPERTIES, LLC, a California Limited
Liability Company; and DOES 1-50, Inclusive;

Defendants.

Case No. CVRI2201491

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

Date: May 25, 2023

Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept.: 10

Reservation #: 561354723159

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on May 25, 2023, at 8:30 a.m., or as soon thereafter as counsel may be heard, in Department 10 of the Riverside Superior Court, the Honorable Judge Harold W. Hopp presiding, Plaintiff JOHN KNEISLY will, and hereby does, move this Court to:

1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the Declaration of Jean-Claude Lapuyade filed concurrently herewith;
2. Conditionally certify the Settlement Class;
3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement, Exclusion Form, Objection Form, and Final Hearing Date to the Settlement Class;
4. Appoint Plaintiff John Kneisly as the Class Representative;
5. Appoint the JCL Law Firm, APC and Zakay Law Group, APC as Class Counsel; and
7. Set a hearing date for final approval of the settlement.

This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement; (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the Declaration of John Kneisly; (6) the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit attached thereto; (7) the [Proposed] Order Granting Preliminary Approval of Class and PAGA Action Settlement and exhibits attached thereto; (8) the records, pleadings, and papers filed in this action; and (9) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

As this Motion is unopposed, the Parties respectfully request relief from the page limit requirement set by California Rules of Court, Rule 3.1113(d).

Dated: May 2, 2023

JCL LAW FIRM, APC

By: 
Jean-Claude Lapuyade
Attorneys for Plaintiff