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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JOSE GARCIA VALLE, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

PACIFIC SHELLFISH, INC., a California
corporation; and DOES 1 through 100,
Inclusive,

Defendants.

Case No. 37-2021-00021898-CU-OE-CTL

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

Date: March 1, 2024
Time: 8:30 a.m.

Judge: Hon. Ronald F. Frazier
Department: 65

Trial Date: N/A
Action Filed: May 17, 2021

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on March 1, 2024, or as soon
3 thereafter as the matter can be heard, in Department 65 of the above-entitled Court, before the
4 Honorable Judge Ronald F. Frazier, Plaintiff JOSE GARCIA VALLE (“Plaintiff”) will apply for
5 an order granting (1) Final Approval of the Class Action and PAGA Settlement, (2) Class Counsel
6 Award and Class Representative Service Award, and (3) Entry of the Final Approval Order and
7 Judgment.

8 This Motion is brought in accordance with the Preliminary Approval Order dated June 9,
9 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action
11 Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay,
12 the Declaration of Jean-Claude Lapuyade, the Declaration of the Plaintiff, and the complete files
13 and records 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.

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18 Respectfully submitted,

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20 Dated: February 6, 2024

JCL LAW FIRM, APC

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22 By: 
23 Jean-Claude Lapuyade, Esq.

24 Attorney for Plaintiff
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