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Attorneys for Plaintiffs KAREN TRUELLE and ANTHONY BROUSSARD

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

KAREN TRUELLE and ANTHONY
BROUSSARD, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated

Plaintiffs,

vs.

CHILDREN OF THE RAINBOW, INC., a
California corporation; and DOES 1 through
50, Inclusive,

Defendants.

Case No. 37-2022-00034860-CU-OE-CTL [Lead]
Case No. 37-2023-00006660-CU-OE-CTL

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

Date: June 14, 2024
Time: 8:30 a.m.

Judge: Hon. Robert Longstreth
Dept.: C-65

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

PLEASE TAKE NOTICE that on June 14, 2024, at 8:30 a.m., or as soon thereafter as counsel may be heard, in Department C-65 of the San Diego Superior Court, the Honorable Judge Robert Longstreth presiding, plaintiffs Karen Trudelle and Anthony Broussard will, and hereby do, move this Court to:

1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the Declaration of Jean-Claude Lapuyade, Esq., filed concurrently herewith;

2. Conditionally certify the Settlement Class;

3. Approve distribution of the proposed Notice of Class Action Settlement to the Settlement Class;

4. Appoint Plaintiffs KAREN TRUELLE and ANTHONY BROUSSARD as the Class Representatives;

5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, Haines Law Group, APC; 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 Action Settlement; (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the Declaration of Paul K. Haines, Esq.; (6) the Declaration of Karen Trudelle; (7) the Declaration of Anthony Broussard; (8) the Declaration of the Settlement Administrator; (9) the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit attached thereto; (10) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement and exhibits attached thereto; (11) the records, pleadings, and papers filed in this action; and (12) 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.

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

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4 Dated: May 21, 2024

JCL LAW FIRM, APC

5 By: 
6 Jean-Claude Lapuyade
7 Attorneys for Plaintiff
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