

ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

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

Plaintiffs,

v.

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

Defendants.

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

**NOTICE OF MOTION FOR FINAL
APPROVAL OF CLASS AND PAGA
SETTLEMENT AND CLASS COUNSEL
AWARD AND CLASS REPRESENTATIVE
SERVICE AWARDS**

Date: December 13, 2024
Time: 8:30 a.m.

Judge: Hon. Robert Longstreth
Department: 65

Trial Date: N/A
Action Filed: August 30, 2022

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on December 13, 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 Robert Longstreth, Plaintiff KAREN TRUDELLE and ANTHONY
5 BROUSSARD (“Plaintiffs”) will apply for an order granting (1) Final Approval of the Class Action
6 and PAGA Settlement, (2) Attorneys’ Fees, Attorneys’ Expenses, and Service Awards, and (3)
7 Entry of the Final Approval Order and Judgment.

8 This Motion is brought in accordance with the Preliminary Approval Order dated July 1,
9 2024, 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 Paul K. Haines, the Declaration of
13 Plaintiff Trudelle, the Declaration of Anthony Broussard, and the complete files and records in this
14 action.

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

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19 Respectfully submitted,

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21 Dated: November 18, 2024

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22 By: 
23 Rachel N. Newman, Esq.

24 Attorney for Plaintiff
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