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Attorneys for Plaintiff JULIO C. HERNANDEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

JULIO C. HERNANDEZ, an individual, on
behalf of himself, and on behalf of all persons
similarly situated,

Plaintiff,

vs.

BREAKFAST CLUB LLC, a California
limited liability company, and DOES 1-50,
Inclusive,

Defendants.

Case No. CVRI2203757

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

Date: May 30, 2024

Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept.: 1

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on May 30, 2024, or as soon thereafter
3 as the matter can be heard, in Department 1 of the above-entitled Court, before the Honorable Judge
4 Harold W. Hopp, Plaintiff JULIO C. HERNANDEZ (“Plaintiff”) will apply for an order granting
5 (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final Approval
6 Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated February
8 5, 2024, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action
10 Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay,
11 the Declaration of Jean-Claude Lapuyade, the Declaration of the Plaintiff, and the complete files
12 and records in this action.

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

16 Dated: May 7, 2024

Respectfully submitted,
JCL LAW FIRM, APC

18 By: 
Jean-Claude Lapuyade, Esq.
19 Attorneys for Plaintiff