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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

WENDY LEAL HERERRA, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

MEADOWBROOK ASSISTED LIVING LLC,
a California limited liability company; SLH
AGOURA HILLS MANAGER, LLC, an
Illinois limited liability company; and DOES 1-
50, Inclusive,

Defendants.

Case No.: 22STCV34427

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

Date: May 9, 2024

Time: 10:00 a.m.

Judge: Hon. Lawrence P. Riff

Dept.: 7

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on May 9, 2024, or as soon thereafter
3 as the matter can be heard, in Department 7 of the above-entitled Court, before the Honorable Judge
4 Lawrence P. Riff, Plaintiff Wendy Leal Herrera, an individual, on behalf of herself, and on behalf
5 of all persons similarly situated (“Plaintiff”) will apply for an order will apply for an order granting
6 (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final Approval
7 Order and Judgment.

8 This Motion is brought in accordance with the Preliminary Approval Order dated December
9 5, 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
10 accompanying Points and Authorities, the Class Action and PAGA Settlement Agreement
11 (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-
12 Claude Lapuyade, Esq., the Declaration of Sean Hartranft (the Settlement Administrator), the
13 Declarations of the Plaintiff, and the complete files 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.

17 Respectfully submitted,

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19 Dated: April 19, 2024

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20 By: Sydney Castillo-Johnson
21 Sydney Castillo-Johnson, Esq.
22 Attorneys for Plaintiffs
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