

ZAKAY LAW GROUP, APLC

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Attorneys for PLAINTIFF PRISCILLA ESTRADA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

PRISCILLA ESTRADA an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

MANPOWER TEMPORARY SERVICES
f.k.a. CPM, LTD. which will be doing business
in California as MANPOWER TEMPORARY
SERVICES, a Nevada corporation; CPM,
LTD., a Nevada corporation; C.L.M.P., LTD.,
a California corporation; EQUUS
WORKFORCE SOLUTIONS, a Kentucky
limited liability company; and DOES 1-50,
Inclusive,

Defendants.

Case No. 37-2022-00030943-CU-OE-CTL

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

Date: July 19, 2024
Time: 9:00 a.m.

Judge: Hon. James A. Mangione
Dept.: C-75

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on July 19, 2024, or as soon
3 thereafter as the matter can be heard, in Department C-75 of the above-entitled Court, before the
4 Honorable Judge James A. Mangione, Plaintiff PRISCILLA ESTRADA (“Plaintiff”) will apply
5 for an order will apply for an order granting (1) Final Approval of the Class Action and PAGA
6 Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated October
8 20, 2023, 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 Madely Nava, (the Settlement
12 Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

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

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18 DATED: June 25, 2024

Respectfully submitted,

ZAKAY LAW GROUP, APLC

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20 By:  _____

21 Rachel Newman, Esq.

22 Attorney for Plaintiff
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