

JCL LAW FIRM, APC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LUCAS DELACRUZ, an individual, on behalf
of himself, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

WAL-MART ASSOCIATES, INC., a
Delaware Corporation; BONOBO, INC., a
Delaware Corporation; and DOES 1 through
50, Inclusive;

Defendants.

Case No. 37-2021-00046421-CU-OE-CTL

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

Date: October 20, 2023

Time: 8:30 a.m.

Judge: Hon. Keri Katz

Dept.: C-74

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on October 20, 2023, or as soon
3 thereafter as the matter can be heard, in Department C-74 of the above-entitled Court, before the
4 Honorable Judge Keri Katz, Plaintiff LUCAS DELACRUZ (“Plaintiff”) will apply for an order
5 will apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and
6 (2) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated May 18,
8 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.

16 Respectfully submitted,

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18 DATED: September 14, 2023

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20 By: 
21 Jean-Claude Lapuyade
22 Attorney for Plaintiff
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