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Attorneys for Plaintiff LUCAS DELACRUZ

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
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: May 5, 2023

Time: 8:30 a.m.

Judge: Hon. Keri Katz

Dept.: C-74

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on May 5, 2023, at 8:30 a.m., or as soon thereafter as counsel may be heard, in Department C-74 of the San Diego Superior Court, the Honorable Judge Keri Katz presiding, plaintiff Lucas Delacruz will, and hereby does, move this Court to:

1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims ("Agreement") attached as Exhibit A to the Declaration of Jean-Claude Lapuyade, Esq., filed concurrently herewith;

2. Conditionally certify the Settlement Class;

3. Approve distribution of the proposed Notice of Class Action Settlement to the Settlement Class;

4. Appoint Plaintiff LUCAS DELACRUZ as the Class Representative;

5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC; and

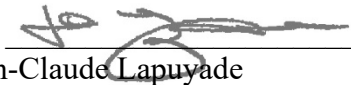
7. Set a hearing date for final approval of the settlement.

This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the Declaration of Lucas Delacruz; (6) the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit attached thereto; (7) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement and exhibits attached thereto; (8) the records, pleadings, and papers filed in this action; and (9) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

As this Motion is unopposed, the Parties respectfully request relief from the page limit requirement set by California Rules of Court, Rule 3.1113(d).

Dated: April 12, 2023

JCL LAW FIRM, APC

By: 
Jean-Claude Lapuyade
Attorneys for Plaintiff