

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney S. Castillo-Johnson (State Bar #343881)
Monnett De La Torre (State Bar #272884)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619)599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
mdelatorre@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
Julieann Alvarado (State Bar #334727)
5440 Morehouse Drive, Suite 3500
San Diego, CA 92121
Telephone: (619)255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com
julieann@zakaylaw.com

Attorneys for Plaintiff TYRA TOLER

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

TYRA TOLER, an individual, on behalf of
herself and on behalf of all persons similarly
situated,

Plaintiff,

vs.

TOTAL TESTING SOLUTIONS, LLC, a
California limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 21STCV38452

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

Date: May 1, 2023
Time: 10:00 a.m.

Judge: Hon. Elihu M. Berle
Dept.: 6

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on May 1, 2023, or as soon
3 thereafter as the matter can be heard, in Department 6 of the above-entitled Court, before the
4 Honorable Judge Elihu M. Berle, Plaintiff TYRA TOLER (“Plaintiff”) will apply for an order will
5 apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2)
6 Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated January
8 3, 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Class Action and PAGA Settlement Agreement
10 (“Agreement”), the Declaration of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the
11 Declaration of Nicole Bench (the Settlement Administrator), the Declaration of the Plaintiff, and
12 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, this motion is not opposed by Defendant. To date, there have
15 been no objections submitted by the Class.

16 Respectfully submitted,

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18 Dated: February 23, 2023

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

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