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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN MATEO

RICARDO COLIN COVARRUBIAS, an
individual, on behalf of himself and on behalf
of all persons similarly situated,

Plaintiff,

v.

PENINSULA CUSTOM HOMES, INC., a
California Corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 22-CIV-02733

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

Date: April 18, 2023
Time: 2:00 p.m.

Judge: Hon. Marie S. Weiner
Dept.: 2

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

2 YOU ARE HEREBY NOTIFIED THAT at 2:00 p.m. on April 18, 2023, or as soon
3 thereafter as the matter can be heard, in Department 2 of the above-entitled Court, before the
4 Honorable Judge Marie S. Weiner, Plaintiff RICARDO COLIN COVARRUBIAS (“Plaintiff”) 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 December
8 6, 2022, 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 Declarations of the Plaintiff, and the complete files
12 and records in this action.

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

16 Respectfully submitted,

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18 Dated: March 23, 2023

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

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