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Attorneys for Plaintiffs NOEMY FLORES and KIMBERLY WUJEK

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

NOEMY FLORES and KIMBERLY
WUJEK, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

AVEN GROUP, INC., a California
corporation; AVEN CARE PROVIDERS,
INC., an entity of unknown origin; and
DOES 1 through 50, Inclusive,

Defendants.

Case No. 21STCV36642

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

Date: February 11, 2025
Time: 10:00 a.m.

Judge: Hon. Kenneth R. Freeman
Dept.: 14

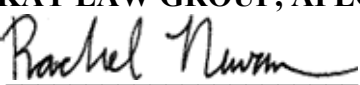
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on February 11, 2025, or as soon
3 thereafter as the matter can be heard, in Department 14 of the above-entitled Court, before the
4 Honorable Judge Kenneth R. Freeman, Plaintiffs NOEMY FLORES and KIMBERLY WUJEK
5 (“Plaintiffs”) 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 August
8 19, 2024, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Amended Class Action and PAGA Settlement
10 Agreement (hereinafter the “Agreement”), the Declaration of Jean-Claude Lapuyade, Esq., the
11 Declaration of Shani O. Zakay, Esq., the Declaration of Katherine Rovertoni of Apex Class
12 Action, LLC (the Settlement Administrator), the Declarations of the Plaintiffs, and the complete
13 files and records in this action.

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

17
18 Dated: January 16, 2025

Respectfully submitted,
ZAKAY LAW GROUP, APLC
By: 
Rachel Newman, Esq.
Attorneys for Plaintiff