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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

AARON GORMAN, an individual, on behalf
of himself, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

DRUMMAC, INC., a Florida corporation;
MORAN ENVIRONMENTAL RECOVERY,
LLC, a Delaware limited liability company;
MORAN TOWING CORPORATION, a New
York corporation; and DOES 1 through 50,
Inclusive.

Defendants.

CASE NO. 34-2022-00313456

**NOTICE OF MOTION AND UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

Hearing Date: December 2, 2022
Hearing Time: 9:00am
Department: 28

Trial Date: Not Set
Action Filed: January 4, 2022

Reservation No. 2619356

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00am on December 2, 2022 or as soon
3 thereafter as the matter can be heard, in Department 28 of the above entitled Court, before the
4 Honorable Judge Lauri Damrell, Plaintiff AARON GORMAN (“Plaintiff”) will apply for an order
5 (1) preliminary approving the proposed settlement of this class action with Defendants
6 DRUMMAC, INC., MORAN ENVIRONMENTAL RECOVERY, LLC, and MORAN TOWING
7 CORPORATION (“Defendants”); (2) approving the form and method for providing class-wide
8 notice; (3) directing that notice of the proposed settlement be given to the class; and (4) scheduling
9 a final approving hearing date to consider Plaintiff’s motion for final approval of the settlement and
10 entry of the Judgment, and Plaintiff’s motion for approval of attorneys’ fees and litigation expenses.

11 This motion for preliminary approval of the class settlement is brought pursuant to
12 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of motion and
13 motion, the accompanying points and authorities, the Declaration of Shani O. Zakay, the Stipulation
14 of Settlement of Class and PAGA Action Claims and Release of Claims (“Agreement”) between
15 the parties, and the complete files and records in this action. All parties have agreed to the proposed
16 class settlement and have met and conferred regarding the motion; therefore, this motion is not
17 opposed by Defendants.

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1 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this
2 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings for
3 the department may be downloaded from the Court's public access site. If you do not have online
4 access, you may call the dedicated phone number for the department as referenced in the local
5 telephone directory, between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the
6 hearing and listen to the tentative ruling. If you do not call the court and the opposing party by 4:00
7 p.m. the court day before the hearing, no hearing will be held.

8 Respectfully submitted,

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10 DATED: November 7, 2022

ZAKAY LAW GROUP, APLC

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12 By: 

13 Shani O. Zakay
14 Attorney for Plaintiff
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