

JCL LAW FIRM, APC

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Attorneys for Plaintiff PEDRO RODRIGUEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

PEDRO RODRIGUEZ, on behalf of himself
and on behalf of all persons similarly
situated,

Plaintiffs,

vs.

R.M. PARKS, INC., a Corporation; and
DOES 1 through 30, Inclusive,

Defendants.

Case No. STK-CV-UOE-2021-0006050

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

Date: June 7, 2023
Time: 9:00 a.m.

Judge: Hon. Erin Guy Castillo
Dept.: 10B

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on June 7, 2023, or as soon
3 thereafter as the matter can be heard, in Department 10B of the above-entitled Court, before the
4 Honorable Judge Erin Guy Castillo, Plaintiff Pedro Rodriguez (“Plaintiff”) will apply for an order
5 will apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and
6 (2) Entry of the Final Approval Order and Judgment.

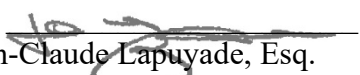
7 This Motion is brought in accordance with the Preliminary Approval Order dated February
8 28, 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action
10 Claims and Release of Claims (hereinafter collectively the “Agreement”), the Declaration of
11 Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Karen
12 Hernandez (the Settlement Administrator), the Declaration of the Plaintiff, and the complete files
13 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 Defendant. To date, there have
16 been no objections submitted by the Class.

17 Respectfully submitted,

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19 Dated: May 12, 2023

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