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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CRUZ

CRISTAL RODRIGUEZ, on behalf of herself
and on behalf of all persons similarly situated,

Plaintiff,

vs.

EAH INC. a California Corporation; and
DOES 1-50, Inclusive,

Defendants.

Case No. 21CV00884

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

Date: July 13, 2023

Time: 8:30 a.m.

Judge: Hon. Marjorie Carter

Dept.: 10

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on July 13, 2023, or as soon
3 thereafter as the matter can be heard, in Department 10 of the above-entitled Court, before the
4 Honorable Judge Marjorie Carter, Plaintiff CRISTAL RODRIGUEZ. (“Plaintiff”) will apply for
5 an order 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.

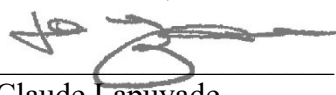
7 This Motion is brought in accordance with the Preliminary Approval Order dated March
8 29, 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Class Action and PAGA Settlement Agreement
10 (“Agreement”), the Declaration of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the
11 Declaration of Nicole Bench (the Settlement Administrator), and the complete files and records in
12 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,

17 Dated: June 15, 2023

JCL LAW FIRM, APC

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