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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

PEDRO RODRIGUEZ and JOSE GARCIA,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiff,

v.

FERMA GREENBOX, INC. a California
Corporation, and DOES 1-50, inclusive,

Defendants.

Case No. RG21101104

[Complaint Filed: 05/21/2021]

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

Hearing Date: February 7, 2023
Hearing Time: 10:00 a.m.
Reservation ID: 485754779697

Judge: Evelio Grillo
Dept.: 21

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on February 7, 2023, or as soon
3 thereafter as the matter can be heard, in Department 21 of the above entitled Court, before the
4 Honorable Judge Evelio Grillo, Plaintiffs Pedro Rodriguez and Jose Garcia (“Plaintiffs”) will apply
5 for an order (1) preliminarily approving the proposed settlement of this class action with Defendant
6 Ferma Greenbox, Inc. (“Defendant”); (2) approving the form and method for providing class-wide
7 notice; (3) directing that notice of the proposed settlement be given to the class; and (4) scheduling
8 a final approval hearing date to consider Plaintiff’s motion for final approval of the settlement and
9 entry of the Judgment, and Plaintiff’s motion for approval of attorneys’ fees and litigation expenses.

10 This motion for preliminary approval of the class settlement is brought pursuant to
11 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of motion and
12 motion, the accompanying points and authorities, the Declaration of Jean-Claude Lapuyade, the
13 Declaration of Shani O. Zakay, the Class Action Settlement Agreement (“Agreement”) between the
14 parties, and the complete files and records in this action. All parties have agreed to the proposed
15 class settlement and have met and conferred regarding the motion; therefore, this motion is not
16 opposed by Defendant. As this Motion is unopposed, the Parties respectfully request relief from the
17 page limit requirement set by California Rules of Court, Rule 3.1113(d).

18 Respectfully submitted,

19
20 Dated: January 5, 2023

JCL LAW FIRM, APC

21 By: 
22 Jean-Claude Lapuyade, Esq.



Superior Court of Alameda County Public Portal

Court Reservation Receipt

Reservation

Reservation ID:
485754779697

Status:
RESERVED

Reservation Type:
Motion re: (FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT)

Number of Motions:
1

Case Number:
RG21101104

Case Title:
Rodriguez VS Ferma Greenbox, Inc.

Filing Party:
Pedro Rodriguez (Plaintiff)

Location:
Rene C. Davidson Courthouse - Department 21

Date/Time:
February 7th 2023, 10:00AM

Confirmation Code:
CR-XQ9BNUWD9LZDZYGSI

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	.00	1	.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount:
\$1.00

Type:
Visa

Account Number:
XXXX1086

Authorization:
00617G

Payment Date:
2023-01-05

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