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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TEHAMA

CHRISTOPHER VANDERBEEK, an individual, on behalf of himself, and on behalf of all persons similarly situated, Plaintiff, v. OUTBACK CONTRACTORS, INC., a California corporation; and DOES 1-50, Inclusive, Defendants.	Case No. 24CI-000225 **NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Date: December 15, 2026 Time: 8:30 a.m. Judge: Hon. Matthew C. McGlynn Dept.: 5

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m., on December 15, 2026, or as soon thereafter as the matter can be heard, in Department 5 of the above-entitled Court, before the Honorable Matthew C. McGlynn, Plaintiff CHRISTOPHER VANDERBEEK ("Plaintiff") will apply for an order granting (1) Final Approval of the Class and PAGA Action Settlement and Release of Claims, (2) Motion for Class Counsel's Fees and Costs, and Service Award, and (3) Entry of the Final Approval Order and Judgment.

This Motion is brought in accordance with the Preliminary Approval Order dated September 9, 2026, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action and Release of Claims (hereinafter the "Agreement"), the Declaration of Sydney Castillo-Johnson, the Declaration of Jean-Claude Lapuyade, the Declaration of Shani O. Zakay, the Declaration of the Settlement Administrator, the forthcoming Declaration of the Plaintiff, and the complete files and records in this action.

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

As this Motion is unopposed, the Parties respectfully request relief from the page limit requirement set by California Rules of Court, rule 3.1113(d).

Dated: November 16, 2026

Respectfully submitted,
JCL LAW FIRM, APC

By: Carolina Faccin
Carolina Faccin, Esq.
Attorney for PLAINTIFF