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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

TANYA MARSHALL, MARIA
ANDRADE, individually, and on behalf of
other members of the general public
similarly situated;

Plaintiffs,

v.

WATTS HEALTHCARE CORPORATION,
a California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No. 19STCV27737

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

Date: August 25, 2025

Time: 10:30 a.m.

Dept.: 1

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

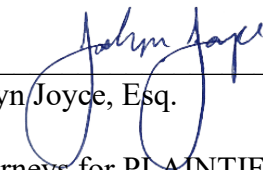
2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on August 25, 2025, or as soon
3 thereafter as the matter can be heard, in Department 1 of the above-entitled Court, Plaintiffs
4 TANYA MARSHALL and MARIA ANDRADE (“Plaintiffs”) will apply for an order granting (1)
5 Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final Approval
6 Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated February
8 26, 2025, 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 (hereinafter, “Agreement”), the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of
11 Shani O. Zakay, Esq., the Declaration of Joanna Ghosh, Esq., the Declaration of Madely Nava
12 (the Administrator), the Declarations of the Plaintiffs, and the complete files and records in this
13 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.

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18 Dated: July 31, 2025

Respectfully submitted,
ZAKAY LAW GROUP, APLC

19 By: 
Jaclyn Joyce, Esq.

20 Attorneys for PLAINTIFFS
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