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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LAN HO, and MARLENE BENITEZ,
individuals, on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

v.

MHF MV MANAGER VI LLC a Delaware
limited liability company; MHF MV
OPERATING VI LLC dba COURTYARD
SAN DIEGO MISSION VALLEY/HOTEL
CIRCLE, a Delaware limited liability company;
MHF MV VI LLC, a Delaware limited liability
company; and DOES 1-50, Inclusive,

Defendants.

Case No. 37-2024-00023005-CU-OE-CTL

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

Date: June 26, 2026

Time: 9:00 a.m.

Judge: Hon. Euketa Oliver

Dept.: C-75

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on June 26, 2026, or as soon thereafter as
3 the matter can be heard, in Department C-75 of the above-entitled Court, before the Honorable Euketa
4 Oliver, Plaintiffs Lan Ho (“Plaintiff Ho”) and Marlene Benitez (“Plaintiff Benitez”) (collectively,
5 “Plaintiffs”) 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 February 27,
8 2026, 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 Claims
10 and Release of Claims (hereinafter the “Agreement”), the Declaration of Jean-Claude Lapuyade, Esq.,
11 the Declaration of Shani O. Zakay, Esq., the Declaration of Thomas D. Rutledge, Esq., the Declaration
12 of Joel D. Larabee, Esq., the Declaration of the Settlement Administrator, the Declaration of Plaintiff
13 Benitez, and the complete files and records in this action.

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

17 Respectfully submitted,

18 Dated: May 29, 2026

JCL LAW FIRM, APC

19 By: Perssia Razma
20 Perssia Razma, Esq.
21 Attorneys for Plaintiff
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