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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

MICHAELA LANERE, an individual, on
behalf of herself, and on behalf of all persons
similarly situated, and in her representative
capacity on behalf of the State of California and
fellow Aggrieved Employees,

Plaintiff,

v.

PHH MORTGAGE CORPORATION, a New
Jersey corporation, d/b/a LIBERTY REVERSE
MORTGAGE; LIBERTY HOME EQUITY
SOLUTIONS a California limited liability
company and DOES 1-50, Inclusive,

Defendants.

Case No. 24CV006254

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

Date: July 11, 2025

Time: 9:00 a.m.

Judge: Hon. Jill H. Talley

Dept.: 23

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on July 11, 2025, or as soon thereafter
3 as the matter can be heard, in Department 23 of the above-entitled Court, before the Honorable
4 Judge Jill H. Talley, Plaintiff MICHAELA LANERE ("Plaintiff") will apply for an order granting
5 (1) 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 4, 2025, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, Stipulation of Settlement of Class and PAGA Action Claims
10 and Release of Claims (hereinafter the "Agreement"), the Declaration of Jean-Claude Lapuyade,
11 the Declaration of Shani O. Zakay, the Declaration of the Plaintiff, the Declaration of Madely Nave
12 and the complete files and records in this action.

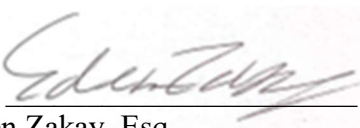
13 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this
14 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings for
15 the department may be downloaded from the public portal. If you do not have online access, you
16 may call the dedicated phone number for the department as referenced in the local telephone
17 directory, between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the hearing and
18 listen to the tentative ruling. If you do not call the court and the opposing party by 4:00 p.m. the
19 court day before the hearing, no hearing will be held.

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

23 Respectfully submitted,

24 Dated: June 17, 2025

ZAKAY LAW GROUP, APLC

26 By: 
27 Eden Zakay, Esq.
28 Attorney for Plaintiff