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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

DORICK MAHEIA, DARRELL WHITE,  
ARTURO MONTANO, TYANA RAINEY, and  
OMAR HERNANDEZ, individuals, on behalf of  
themselves and on behalf of all persons similarly  
situated,

Plaintiff,

v.

CLEAN EARTH ENVIRONMENTAL  
SOLUTIONS, INC., a Delaware corporation;  
HARSCO CORPORATION, a Delaware  
corporation; CLEAN EARTH, LLC, a Delaware  
Limited Liability Company, previously named  
as fictitious DOE 1; and DOES 2-50, Inclusive,

Defendants.

Case No. 22STCV24279

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

Date: October 7, 2024  
Time: 10:30 a.m.

Judge: Hon. Stuart M. Rice.  
Dept.: 1

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on October 7, 2024, or as soon  
3 thereafter as the matter can be heard, in Department 1 of the above-entitled Court, before the  
4 Honorable Judge Stuart M. Rice, Plaintiffs DORICK MAHEIA, DARRELL WHITE, ARTURO  
5 MONTANO, TYANA RAINEY, and OMAR HERNANDEZ (“Plaintiffs”) will apply for an order  
6 granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final  
7 Approval Order and Judgment.

8 This Motion is brought in accordance with the Preliminary Approval Order dated June 5,  
9 2024, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the  
10 accompanying points and authorities, the Class Action and PAGA Settlement Agreement and  
11 Class Notice (“Agreement”), the Declaration of Shani O. Zakay, the Declaration of Jean-Claude  
12 Lapuyade, the Declaration of Jaclyn Joyce, the Declaration of George Azadian, the Declaration of  
13 Vartan Madoyan, the Declaration of the Plaintiffs, the Declaration of Madely Nava (the  
14 Settlement Administrator), and the complete files and records in this action.

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

18  
19 Dated: September 12, 2024

Respectfully submitted,  
**ZAKAY LAW GROUP, APLC**

20 By:   
21 Shani O. Zakay  
22 Jaclyn Joyce

23 Attorney for Plaintiff  
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