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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

DORICK MAHEIA, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

CLEAN EARTH ENVIRONMENTAL
SOLUTIONS, INC., a Delaware corporation;
HARSCO CORPORATION, a Delaware
corporation; and DOES 1-50, Inclusive,

Defendants.

Case No.: 22STCV24279

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

Hearing Date: May 1, 2024
Hearing Time: 11:00 a.m.

Judge: Hon. Stuart M. Rice
Department: 1

TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 11:00 a.m. on May 1, 2024 or as soon thereafter as the matter can be heard, in Department 1 of the above entitled Court, before the Honorable Judge Stuart M. Rice, Plaintiffs Dorrick Maheia, Darrell White, Arturo Montano, Tyana Rainey and Omar Hernandez (collectively “Plaintiffs”) will apply for an order (1) preliminary approving the proposed settlement of this class action with Defendant CLEAN EARTH ENVIRONMENTAL SOLUTIONS, INC. and HARSCO CORPORATION (“Defendants”); (2) approving the form and method for providing class-wide notice; (3) directing that notice of the proposed settlement be given to the class; and (4) scheduling a final approving hearing date to consider Plaintiffs’ motion for final approval of the settlement and entry of the Judgment, and Plaintiffs’ motion for approval of attorneys’ fees and litigation expenses.

This motion for preliminary approval of the class settlement is brought pursuant to California Rules of Court, rule 3.769. Plaintiffs' motion will be based on this notice of motion and motion, the accompanying points and authorities, the Declarations of Shani O. Zakay, Jean-Claude Lapuyade, George Azadian and Vartan Madoyan, the Declaration of Sean Hartranft of Apex Class Action LLC, the Class Action and PAGA Settlement Agreement and Class Notice ("Agreement") between the parties, and the complete files and records in this action. All parties have agreed to the proposed class settlement and have met and conferred regarding the motion; therefore, this motion is not opposed by Defendants.

Respectfully submitted,

DATED: April 8, 2024

ZAKAY LAW GROUP, APLC

By: 
Shani O. Zakay
Attorney for Plaintiff