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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ISAIAH DAVIS, CHARLES HARRELL,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

RPM JUICE, INC., a California Corporation;
RPM FOODS, INC., a California Corporation;
and DOES 1-50, Inclusive.

Defendants.

Case No. 21STCV14755

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

Hearing Date: June 23, 2023
Hearing Time: 10:00 a.m.
Department: 7

Trial Date: None
Action Filed: April 19, 2021

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

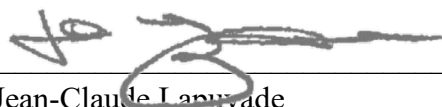
2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on June 23, 2023, or as soon
3 thereafter as the matter can be heard, in Department 7 of the above entitled Court, before the
4 Honorable Lawrence P. Riff, Plaintiffs ISAIAH DAVIS and CHARLES HARRELL (“Plaintiffs”)
5 will apply for an order (1) preliminary approving the proposed settlement of this Class and PAGA
6 action against Defendants RPM JUICE, INC. and RPM FOODS, INC. (“Defendants”); (2)
7 approving the form and method for providing class-wide notice; (3) directing that notice of the
8 proposed settlement be given to the class; and (4) scheduling a final approving hearing date to
9 consider Plaintiffs’ motion for final approval of the settlement and entry of the Judgment, and
10 Plaintiffs’ motion for approval of attorneys’ fees and litigation expenses.

11 This motion for preliminary approval of the class and PAGA settlement is brought pursuant
12 to California Rules of Court, Rule 3.769. Plaintiffs’ motion will be based on this notice of motion,
13 the accompanying points and authorities, the Declaration of Jean-Claude Lapuyade, Esq., the
14 Declaration of Shani O. Zakay, Esq., the Declaration of Isaiah Davis, the Declaration of Charles
15 Harrell, the Declaration of Lisa Mullin, the Class Action and PAGA Settlement Agreement
16 and Class Notice (“Agreement”) between the parties, and the complete files and records in this
17 action. All parties have agreed to the proposed class and PAGA settlement and have met and
18 conferred regarding the motion; therefore, this motion is not opposed by Defendant.

19 Respectfully submitted,

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21 DATED: April 20, 2023

JCL Law Firm, APC

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23 By: 

24 Jean-Claude Lapuyade
25 Attorney for Plaintiffs
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