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Attorneys for Plaintiff ALAN CARRILLO RODRIGUEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

ALAN CARRILLO RODRIGUEZ, an
individual, on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiff,

v.

TITAN WORKFORCE, a California
Corporation; and DOES 1-50, Inclusive;

Defendants.

Case No.: STK-CV-UOE-2022-0003036

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

Date: March 28, 2024

Time: 9:00 a.m.

Judge: Hon. Barbara A. Kronlund

Dept.: 10D

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on March 28, 2024, or as soon
3 thereafter as the matter can be heard, in Department 10D of the above-entitled Court, before the
4 Honorable Judge Barbara A. Kronlund, Jr., Plaintiff ALAN CARRILLO RODRIGUEZ will apply
5 for an order 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 September
8 5, 2023, 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
10 Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay,
11 Esq., the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of the Settlement
12 Administrator, the Declaration of the Plaintiff, and the complete files and records in this action.

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

16 Respectfully submitted,

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18 Dated: March 5, 2024

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19 By: *Sydney Castillo-Johnson*
20 Sydney Castillo-Johnson, Esq.
21 Attorneys for Plaintiffs
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