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Attorneys for Plaintiff ABIGAIL CHAMBERLAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF YOLO

ABIGAIL CHAMBERLAN, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiff,

vs.

CLASSIC VMS, INC. (dba WOODLAND
BODY WORKS and COLLISION PROS), a
California Corporation; COLLISION PRO'S
INC., a California Corporation; and DOES 1
through 50, Inclusive,

Defendants.

Case No. CV2022-0652

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

Date: May 14, 2024
Time: 9:00 A.M.

Judge: Hon. David Rosenberg
Dept.: 14

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on May 14, 2024, or as soon thereafter
3 as the matter can be heard, in Department 14 of the above-entitled Court, before the Honorable
4 Judge David Rosenberg, Plaintiff ABIGAIL CHAMBERLAN (“Plaintiff”) will apply for an order
5 granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final
6 Approval Order and Judgment.

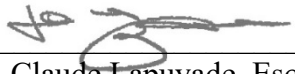
7 This Motion is brought in accordance with the Preliminary Approval Order dated January
8 19, 2024, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action
10 Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay,
11 the Declaration of Jean-Claude Lapuyade, the Declaration of the Plaintiff, the Declaration of the
12 Settlement Administrator, 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: April 19, 2024

JCL LAW FIRM, APC

19 By: 
20 Jean-Claude Lapuyade, Esq.
21 Attorneys for Plaintiff
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