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Attorneys for Plaintiff BRAD KLEIN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

BRAD KLEIN, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

REDZONE SECURITY INC., a California
Corporation; and DOES 1-50, Inclusive,

Defendant.

Case No. CVRI2202841

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

Date: August 15, 2024

Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept.: 1

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on August 15, 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 Harold W. Hopp, Plaintiff Brad Klein (“Plaintiff”) will apply for an order will
5 apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2)
6 Entry of the Final Approval Order and Judgment.

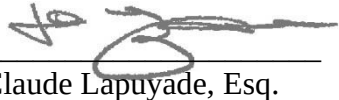
7 This Motion is brought in accordance with the Preliminary Approval Order dated May 8,
8 2024, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action
10 Claims and Release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

14 The Court will make a tentative ruling on the merits of this matter by 3:00 p.m. on the
15 court day prior to the hearing. Tentative rulings will be available on the Internet or by calling 1-
16 760-904-5722. To view go to: <http://www.riverside.courts.ca.gov> and click on the tentative ruling
17 link. The tentative ruling shall become the ruling of the Court unless, by 4:30 p.m. on the court
18 day before the scheduled hearing, a party gives notice of intent to appear to all parties and the
19 court. The notice of intent to appear must be given either in person or by telephone. Where notice
20 of intent to appear has been properly given, or upon direction of the Court, oral argument will be
21 permitted.

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

25
26 Dated: July 24, 2024

Respectfully submitted,
JCL LAW FIRM, APC

27 By: 
Jean-Claude Lapuyade, Esq.
28 Attorneys for Plaintiff