

JCL LAW FIRM, APC

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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;

Defendants.

Case No. CVRI2202841

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

Date: April 29, 2024

Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept.: 1

Reservation #: 804963484303

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on April 29, 2024, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 1 of the Riverside Superior Court, the Honorable Judge Harold W. Hopp
4 presiding, Plaintiff BRAD KLEIN will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
6 and PAGA Action Claims and Release of Claims ("Agreement") attached as Exhibit A to the
7 Declaration of Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement,
10 Exclusion Form, Objection Form, and Final Hearing Date to the Settlement Class;

11 4. Appoint Plaintiff Brad Klein as the Class Representative;

12 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; and

13 7. Set a hearing date for final approval of the settlement.

14 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
15 Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement; (3)
16 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
17 Declaration of the Plaintiff; (6) the Stipulation of Settlement of Class and PAGA Action Claims and
18 Release of Claims and exhibit attached thereto; (7) the [Proposed] Order Granting Preliminary
19 Approval of Class and PAGA Action Settlement and exhibits attached thereto; (8) the records,
20 pleadings, and papers filed in this action; and (9) upon such other documentary and oral evidence or
21 argument as may be presented to the Court at or prior to the hearing of this Motion.

22 As this Motion is unopposed, the Parties respectfully request relief from the page limit
23 requirement set by California Rules of Court, Rule 3.1113(d).

24 Dated: April 4, 2023

JCL LAW FIRM, APC

25 By: Sydney Castillo-Johnson
26 Sydney Castillo-Johnson
27 Attorneys for Plaintiff
28

Court Reservation Receipt

Reservation	
Reservation ID: 804963484303	Status: RESERVED
Reservation Type: Motion for Preliminary Approval of Class Action Settlement	Number of Motions: 1
Case Number: CVRI2202841	Case Title: KLEIN vs REDZONE SECURITY INC.
Filing Party: BRAD KLEIN (Plaintiff)	Location: Historic Court House - Department 1
Date/Time: April 29th 2024, 8:30AM	Confirmation Code: CR-BLFL9UDXMQVTETQEV

Fees			
Description	Fee	Qty	Amount
Motion for Preliminary Approval of Class Action Settlement	0.00	1	0.00
TOTAL			\$0.00

Payment	
Amount: \$0.00	Type: NOFEE

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