

1 Yosef Peretz (SBN 209288)
yperetz@peretzlaw.com
2 Shane Howarter (SBN 311970)
showarter@peretzlaw.com
3 PERETZ & ASSOCIATES
22 Battery Street, Suite 200
4 San Francisco, CA 94111
Tel: 415.732.3777
5 Fax: 415.732.3791

6 Martin M. Horowitz (SBN 79073)
mhorowitz@h-legal.com
7 Stephanie Rubinoff (SBN 98229)
srubinoff@h-legal.com
8 HOROWITZ & RUBINOFF
180 Grand Avenue, Suite 1380
9 Oakland, CA 94612
10 Telephone: 510.444.7717

11 Attorneys for Named Plaintiffs ADRIANA HAYTER,
12 LARINE SHIELDS, and TAYLOR EVANS

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **IN AND FOR THE COUNTY OF SAN FRANCISCO**

15 ADRIANA HAYTER, LARINE SHIELDS,
16 and TAYLOR EVANS; individually, and on
17 behalf of all other similarly situated persons;
and ROES 1-100,

18 Plaintiffs,

19 v.

20 EWALD & WASSERMAN RESEARCH
21 CONSULTANTS, LLC, a California limited
22 liability corporation; KATRIN EWALD, an
individual; LISA WASSERMAN, an
individual; and DOES 1-20,

23 Defendants.
24

Case No. CGC-19-577753

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

Date: November 10, 2021

Time: 9:15 a.m.

Dept.: 304

Judge: Hon. Anne-Christine Massullo

1 PLEASE TAKE NOTICE THAT on November 10, 2021, at 9:15 a.m., or as soon
2 thereafter as this matter may be heard by the Honorable Anne-Christine Massullo, in Department
3 304 of this Court, Plaintiffs ADRIANA HAYTER, LARINE SHIELDS, and TAYLOR EVANS
4 (collectively, "Named Plaintiffs"), on behalf of themselves and other similarly situated
5 individuals, and ROES 1-100 (collectively, "Plaintiffs") shall move for final approval of the
6 parties' class action settlement in this matter in the amount of \$144,000, inclusive of fees and
7 costs.

8 Plaintiffs submit that the settlement is fair, adequate and reasonable, and that it confers a
9 substantial benefit upon the class. Defendants have informed Plaintiffs that they do not oppose
10 this Motion. Accordingly, under California Rule of Court 3.769, Plaintiffs request that the Court
11 grant final approval of the settlement.

12 This motion is based on this Notice and Motion, the accompanying Memorandum of
13 Points and Authorities, the Declaration of Yosef Peretz and exhibits attached thereto, the
14 Declaration of Zachary Cooley on behalf of Settlement Administrator Simpluris, Inc. and exhibits
15 attached thereto, and the papers and records on file in this action.

16 Dated: October 19, 2021

PERETZ & ASSOCIATES

17 By: 

Yosef Peretz

Shane Howarter

Attorneys for Named Plaintiffs

ADRIANA HAYTER, LARINE SHIELDS, and
TAYLOR EVANS