



1 PLEASE TAKE NOTICE THAT on August 13, 2021, at 10:00 a.m., or as soon thereafter  
2 as this matter may be heard by the Honorable Winifred Y. Smith, in Department 21 of this Court,  
3 Plaintiffs IRENE CLINE, LYNN CHO, DESIREE PACHECO, and ITZEL MARLENE DIAZ  
4 (collectively, "Named Plaintiffs"), on behalf of themselves and other similarly situated  
5 individuals, and on behalf of the CALIFORNIA LABOR AND WORKFORCE  
6 DEVELOPMENT AGENCY, and on behalf of the STATE OF CALIFORNIA (collectively,  
7 "Plaintiffs") shall move for (1) preliminary approval of the parties' class action settlement in this  
8 matter in the amount of \$170,250.21, inclusive of fees and costs; (2) preliminary approval of  
9 Named Plaintiffs as class representatives and their attorneys as class counsel; (3) conditional  
10 granting of class certification; (4) naming of Simpluris, Inc. as Claims Administrator; (5)  
11 authorization of the mailing of notice to the settlement class; and (6) scheduling of a final approval  
12 hearing date.

12 Plaintiffs submit that the settlement is fair, adequate and reasonable, and that it confers a  
13 substantial benefit upon the class. Accordingly, under California Rule of Court 3.769, Plaintiffs  
14 request that the Court grant preliminary approval of the settlement, set the deadline for filing  
15 objections to the settlement, schedule a final approval hearing, and approve the proposed notice  
16 plan.

16 This motion is based on this Notice and Motion, the accompanying Memorandum of  
17 Points and Authorities, the Request for Judicial Notice, the Declarations of Yosef Peretz, Irene  
18 Cline, Lynn Cho, Desiree Pacheco, Itzel Marlene Diaz, Felicia Lopez and Eric Springer on behalf  
19 of Simpluris and all exhibits attached thereto, and the papers and records on file in this action.

20 Dated: July 22, 2021

PERETZ & ASSOCIATES

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22  
23 By:  \_\_\_\_\_

Yosef Peretz

Shane Howarter

Attorneys for Named Plaintiffs

ADRIANA HAYTER, LARINE SHIELDS, and  
TAYLOR EVANS