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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;  
18 and ROES 1-100,

19 Plaintiffs,

20 v.

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

26 Defendants.

Case No. CGC-19-577753

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

**Date:** May 3, 2021

**Time:** 10:00 a.m.

**Dept.:** 304

**Judge:** Hon. Anne-Christine Massullo

1 PLEASE TAKE NOTICE THAT on May 3, 2021, at 10:00 a.m., or as soon thereafter as  
2 this matter may be heard by the Honorable Anne-Christine Massullo, in Department 304 of this  
3 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 (1) preliminary approval  
6 of the parties' class action settlement in this matter in the amount of \$144,000, inclusive of fees  
7 and costs; (2) preliminary approval of Named Plaintiffs as class representatives and their attorneys  
8 as class counsel; (3) conditional granting of class certification; (4) naming of Simpluris, Inc. as  
9 Claims Administrator; (5) authorization of the mailing of notice to the settlement class; and (6)  
10 scheduling of a final approval hearing date.

11 Plaintiffs submit that the settlement is fair, adequate and reasonable, and that it confers a  
12 substantial benefit upon the class. Defendants have informed Plaintiffs that they do not oppose  
13 this Motion. Accordingly, under California Rule of Court 3.769, Plaintiffs request that the Court  
14 grant preliminary approval of the settlement, set the deadline for filing objections to the  
15 settlement, schedule a final approval hearing, and approve the proposed notice plan.

16 This motion is based on this Notice and Motion, the accompanying Memorandum of  
17 Points and Authorities, the Declaration of Yosef Peretz and exhibits attached thereto, and the  
18 papers and records on file in this action.

19 Dated: April 9, 2021

PERETZ & ASSOCIATES

20 By: 

Yosef Peretz

Shane Howarter

Attorneys for Named Plaintiffs

ADRIANA HAYTER, LARINE SHIELDS, and  
TAYLOR EVANS