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14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF LOS ANGELES

16 YOUNES YOUNES, on behalf of himself
17 and all others similarly situated,

18 Plaintiff,

19 v.

20 ELVIRA TAYLOR and DOES 1 through 200,
21 inclusive,

22 Defendants.

Case No. 24STCV12520

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR CLASS CERTIFICATION**

[Memorandum of Points and Authorities,
Statement Regarding Class Notice, Proposed
Notice of Pending Class Action, Declarations of
Younes Younes, Adam Zarazinski, Shaun Martin,
and Nicole G. Malick, and Proposed Order Filed
Concurrently Herewith]

Assigned for All Purposes to Hon. Elihu Berle

24 Date: May 7, 2025
25 Time: 11:00 A.M.
26 Place: 312 N. Spring Street,
Los Angeles, CA 90012
27 Dept. 6

28 Action Filed: May 17, 2024
Trial Date: None

1 **TO THE COURT AND ALL PARTIES AND ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on May 7, 2025, at 11:00 a.m., or as soon thereafter as the
3 matter may be heard in Department 6 of the above-entitled court, located at 312 N. Spring Street, Los
4 Angeles, CA 90012, Plaintiff Younes Younes, on behalf of himself and all others similarly situated,
5 will and hereby does move this Court for an order:

- 6 1. Certifying the Class as defined in Plaintiff's Memorandum of Points and Authorities;
7 2. Appointing Plaintiff Younes Younes as Class Representative; and
8 3. Appointing Plaintiff's counsel as Class Counsel.

9 This Motion is made on the grounds that Plaintiff has satisfied the requirements for class
10 certification under California Code of Civil Procedure § 382 and relevant case law. The Class is
11 ascertainable, sufficiently numerous, and shares a well-defined community of interest, with common
12 questions of law and fact predominating over individual issues. Class treatment is also superior to
13 alternative methods of adjudication in ensuring an efficient, equitable, and consistent resolution of the
14 claims.

15 This Motion is based on this Notice of Motion, the Memorandum of Points and Authorities,
16 the Declarations of Younes Younes, Adam Zarazinski, Shaun Martin, and Nicole G. Malick; the
17 papers, pleadings, and records on file in this action; and any additional evidence or argument that may
18 be presented at the hearing on this matter.

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20 Dated: April 7, 2025

Respectfully submitted,

21  /NGM

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27 *Counsel for Plaintiff Younes Younes*
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