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13 **UNITED STATES DISTRICT COURT**
 14 **CENTRAL DISTRICT OF CALIFORNIA**
 15

16 CARLOS MORENO, individually, and on
 17 behalf of all others similarly situated,

18 Plaintiff,

19 v.

20 PRETIUM PACKAGING, L.L.C, a
 Delaware limited liability company, and
 21 DOES 1 through 10, inclusive

22 Defendants

Case No. 8:19-cv-02500-SB-DFM

[Hon. Stanley Blumenfeld, Jr.]

**PLAINTIFF’S NOTICE OF
 MOTION AND MOTION FOR
 FINAL APPROVAL OF CLASS
 ACTION SETTLEMENT AND
 CLASS REPRESENTATIVE
 SERVICE PAYMENTS**

Date: August 6, 2021
 Time: 8:30 a.m.
 Courtroom: 6C

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on August 6, 2021 at 8:30 a.m. or as soon
3 thereafter as the matter can be heard in Courtroom 6C of the United States District
4 Court for the Central District of California located at 350 West 1st Street, Los
5 Angeles, California 90012, Plaintiff Carlos Moreno will, and hereby does, move
6 for an order as follows:

7 1. Granting final approval of the terms of the Stipulation of Settlement
8 (“Stipulation” or “Settlement”) as fair, reasonable, and adequate to all Parties and
9 all Class Members;

10 2. Finding that the Class Notices distributed to the Class Members
11 pursuant to the Court’s order granting preliminary approval constituted the best
12 notice practicable under the circumstances to all Class Members;

13 3. Finally certifying the Class for settlement purposes only;

14 4. Directing that compensation to the Settlement Class Members be paid
15 pursuant to the terms of the Stipulation;

16 5. Appointing Plaintiff as Class Representatives for settlement purposes,
17 and approving a Class Representative Service Award of \$10,000.00 to Plaintiff;

18 6. Approving the payment to the California Labor and Workforce
19 Development Agency in the amount of \$37,500.00;

20 7. Approving the Claims Administrator’s costs and fees in the amount of
21 \$15,000.00 as provided for in the Stipulation; and

22 8. Entering final judgment in the Action.¹

23 This motion will be based on the accompanying Memorandum of Points and
24 Authorities, the Declarations of Justin F. Marquez, Carlos Moreno, Madely Nava,
25 Suyap Madrid, and Salvadora Dominguez, such oral argument as may be
26 heard by the Court, and all other papers on file in this action.

27
28 ¹ On June 3, 2021, Plaintiffs filed a separate motion for approval of Class Counsel’s attorneys’ fees and costs. ECF No. 57.

