

KAZEROUNI LAW GROUP, APC  
1303 EAST GRAND AVENUE, SUITE 101  
ARROYO GRANDE, CA 93420

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*Attorneys for Plaintiff,*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**ROSA CALDERON; AND,  
JAVIER CALDERON,  
INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,**

Plaintiffs,

v.

**THE WOLF FIRM, A LAW  
CORPORATION,**

Defendant.

**Case No.:** CV16-1266 JLS (KESx)

**PLAINTIFFS ROSA CALDERON;  
AND, JAVIER CALDERON'S  
NOTICE OF MOTION AND  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

**DATE:** December 15, 2017

**TIME:** 2:30 p.m.

**DPT:** 10A

**HON. JOSEPHINE L. STATON**

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on **DECEMBER 15, 2017** at **2:30 P.M.** or as soon thereafter as the matter may be heard in **COURTROOM 10A** of the above captioned Court located at **411 WEST FOURTH STREET, SANTA ANA, CA 92701-4516**, Plaintiffs ROSA CALDERON; and, JAVIER CALDERON (“Plaintiffs”) moves the Court pursuant to Federal Rule of Civil Procedure 23 for Preliminary Approval of the Parties’ Class Action Settlement. Specifically, through this Motion, Plaintiffs move for certification of a settlement class; appointment of class counsel and class representatives; preliminary approval of the Parties’ proposed settlement; and, approval of the Parties’ proposed plan to provide notice to the class. This Motion is made on the following grounds:

1. The proposed Class satisfies the requirements of Rule 23 for conditional certification for settlement purposes only;
2. The proposed settlement is the product of non-collusive negotiations and is fundamentally fair, reasonable and adequate; and hence, warrants preliminary approval.

This Motion is based on the accompanying Memorandum of Points and Authorities, the exhibits attached thereto, all pleadings and papers on file in this action and upon such other matters as the Court deems proper.

Date: November 13, 2017

**KAZEROUNI LAW GROUP, APC**

By:         /s/ Matthew M. Loker          
MATTHEW M. LOKER, ESQ.  
ATTORNEY FOR PLAINTIFFS