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6 Attorneys for Plaintiff
MARY STEARN, individually, and on behalf of
7 all others similarly situated

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10 MARY STEARN, individually, and on behalf of
11 all others similarly situated,

12 Plaintiff,

13 vs.

14 GIRL SCOUTS OF GREATER LOS
ANGELES, a California Corporation, DOES 1
15 through 25, inclusive,

16 Defendants.

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

OCT 16 2020

Sherril R. Carter, CLERK OF COURT
By , Deputy
Steven Drew

Case No. 18STCV05321

[Assigned for all purposes to Hon. William F. Highberger, Dept. 10]

**NOTICE OF PLAINTIFF'S UNOPPOSED
MOTION AND MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT, AND AWARD FOR
ATTORNEYS' FEES AND COSTS**

[Filed concurrently with Plaintiff's
Memorandum of Points and Authorities;
Declaration of Catherine J. Coble; Declaration
of Beth Gunn; Declaration of Mary Stearn;
Declaration of Jarrod Salinas; and [Proposed]
Order and Judgment]

Dept.: 10
Date: November 6, 2020
Time: 11:00 a.m.

Action Filed: November 16, 2018
Trial Date: None Set

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1 **TO THE COURT AND ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE THAT** on November 6, 2020 at 11:00 a.m., or as soon thereafter
3 as the matter can be heard in Department 10 of the above-captioned Court, located at 312 North
4 Spring Street, Los Angeles, California 90012, Plaintiff Mary Stearn (“Plaintiff”) will, and hereby
5 does, move this Court, pursuant to California Rule of Court 3.769, for an order granting final
6 approval of the proposed class action settlement. Specifically, Plaintiff requests that the court issue
7 an order and enter final judgment: (1) granting final approval of the settlement; (2) approving
8 distribution of the Settlement funds to the participating Class Members; (3) approving distribution
9 of the \$52,933.33 in civil penalties under the California Private Attorneys General Act of 2004,
10 California Labor Code section 2698 *et seq.* (“PAGA”) as follows: \$39,700 (75% of the PAGA
11 penalty amount) paid to the California Labor Workforce and Development Agency (“LWDA”), and
12 \$13,233.33 (25% of the PAGA penalty amount) allocated to the Net Settlement Amount to be
13 distributed to the class members; (4) approving Plaintiff’s request for an award to Gunn Coble LLP
14 as Class Counsel in an amount up to \$128,430 in attorneys’ fees and an amount up to \$11,100 for
15 reimbursement of actual costs and expenses; (5) approving the request for a Class Representative
16 Enhancement service award of \$5,000 to Plaintiff; and (6) approving estimated payment of \$4,500
17 to Simpluris for settlement administration costs. A [Proposed] Judgment and Order of Final
18 Approval of Class Action Settlement is filed concurrently herewith. Plaintiff’s Motion is unopposed.

19 Pursuant to Rule 3.769 of the California Rules of Court, which requires Court approval of
20 the settlement of class actions, Plaintiff makes this Motion on the grounds that the proposed
21 settlement is fair, adequate, and reasonable and that all Class Members have been given an
22 opportunity to participate in, opt out of, or object to the Settlement. Out of 186 Class Members, only
23 three opt outs were received and there were no timely objections to the Settlement.

24 This Motion is based upon this Notice of Motion and Unopposed Motion, the accompanying
25 Memorandum of Points and Authorities in Support of this Motion, the declarations of Catherine J.
26 Coble and Beth A. Gunn, Class Counsel, the declaration of Plaintiff Mary Stearn, Class and PAGA
27 Representative, the declaration of Jarrod Salinas, Senior Project Manager with Simpluris, Settlement
28 Administrator, and attached exhibits, such evidence and argument of counsel as may be presented

1 at the hearing, the complete files and records in the above-captioned matter, and such additional
2 matters as the Court may consider.

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DATED: October 15, 2020

GUNN COBLE LLP



By: _____

Beth A. Gunn
Catherine J. Coble

Attorneys for Plaintiff
MARY STEARN, individually, and on behalf of
all others similarly situated