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18 *Attorneys for Plaintiffs, the Certified Class,*
19 *and Aggrieved Employees*

20 SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

21 LARONDA RASMUSSEN, et al.,
22 Plaintiffs,
23 vs.
24 THE WALT DISNEY COMPANY, et al.,
25 Defendants.
26

Civil Case No.: 19STCV10974

CLASS ACTION

ASSIGNED FOR ALL PURPOSES TO:
Hon. Elihu M. Berle

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

Date: January 10, 2025
Time: 10:00 a.m.
Location: Dept. 6

Electronically FILED by
Superior Court of California,
County of Los Angeles
11/26/2024 8:58 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By K. Valenzuela, Deputy Clerk

1 **NOTICE OF MOTION**

2 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

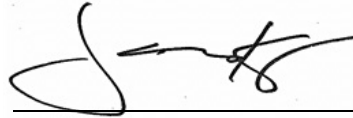
3 PLEASE TAKE NOTICE that on January 10, 2025 at 10:00 a.m., or as soon thereafter as the
4 matter may be heard, in Department 6 of this Court at Spring Street Courthouse, 312 North Spring
5 Street, Los Angeles, CA 90012, Plaintiffs will and hereby move this Court pursuant to California Rule
6 of Court 3.769(c) for entry of the proposed Order filed herewith by: (1) granting preliminary approval
7 of the parties' class action Settlement Agreement; (2) ordering the proposed Class Notice to be sent to
8 the Settlement Class; (3) appointing CPT Group as Settlement Administrator; (4) granting conditional
9 certification of the Settlement Class; (5) conditionally appointing Plaintiffs LaRonda Rasmussen,
10 Karen Moore, Virginia Eady-Marshall, Enny Joo, Rebecca Train, Nancy Dolan, Anabel Pareja Sinn,
11 Dawn Johnson, and Chelsea Buckley, f.k.a. Hanke, as Class Representatives and Goldstein, Borgen,
12 Dardarian & Ho, Andrus Anderson, and Cohen Milstein Sellers & Toll PLLC as Class Counsel; and
13 (6) setting a date for hearing and filing deadlines for Plaintiffs' Motion for Final Approval of Class and
14 Representative Action Settlement, Motion for Attorneys' Fees and Costs, and Motion for Service
15 Awards.

16 This motion is based upon this Notice of Motion and Motion; the Memorandum of Points and
17 Authorities in Support thereof; Plaintiffs' Request for Judicial Notice In Support of Plaintiffs' Motion
18 for Preliminary Approval of Class and Representative Action Settlement; the Declarations of James
19 Kan, Lori E. Andrus, and Christine E. Webber in Support of Plaintiffs' Motion for Class and
20 Representative Action Settlement; Compendium of Plaintiffs' Declarations in Support of Plaintiffs'
21 Motion for Preliminary Approval of Class and Representative Action Settlement (which includes
22 declarations of Plaintiffs LaRonda Rasmussen, Karen Moore, Virginia Eady-Marshall, Enny Joo,
23 Rebecca Train, Nancy Dolan, Anabel Pareja Sinn, Dawn Johnson, and Chelsea Buckley); the proposed
24 Order granting preliminary approval; the Declaration of Scott G. Grimes in Support of Plaintiffs'
25 Request for Judicial Notice; the proposed Order granting Plaintiffs' Request for Judicial Notice; the
26 other records, pleadings, and papers filed in this action; and upon such other documentary and oral
27 evidence or argument as may be presented to the Court at the hearing for this motion.

1 Dated: November 25, 2024

Respectfully submitted,

2 GOLDSTEIN, BORGEN, DARDARIAN & HO

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James Kan

5 *Attorneys for Plaintiffs, the Certified Class,*
6 *and Aggrieved Employees*

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