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Attorneys for Plaintiff Kwane Gatlin and others similarly situated

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA
(UNLIMITED JURISDICTION - COMPLEX)

KWANE GATLIN, individually and on behalf
of others similarly situated,

Plaintiff,

vs.

ANHEUSER-BUSCH, LLC, an entity;
ANHEUSER-BUSCH INBEV WORLDWIDE,
INC. an entity, the HORIZON BEVERAGE
COMPANY, L.P., an entity, and DOES 1-50,
inclusive,

Defendants.

ELECTRONICALLY FILED

Superior Court of California,
County of Alameda

06/20/2023 at 03:33:04 PM

By: Anita Dhir,
Deputy Clerk

CASE NO. RG19015524

RESERVATION NO. 075310611945

CLASS ACTION

**NOTICE OF MOTION AND
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: August 11, 2023

Time: 9:00 A.M.

Dept: 21

Judge: Honorable Evelio Grillo

Filed: April 18, 2019

Trial: To be set

TO: ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that on August 11, 2023, at 9:00 a.m., in Department 21 of this Court, located at 1221 Oak Street, Oakland, CA 94612, Kwane Gatlin (“Plaintiff”) will and hereby does move this Court pursuant to Rule 3.769, California Rules of Court, to enter an order:

1. Granting preliminary approval of Plaintiff’s and Anheuser-Busch, LLC’s, and Anheuser-Busch InBev Worldwide, Inc.’s (collectively referred to as “AB Defendants”) class action and California Private Attorneys General Act of 2004 (“PAGA”) settlement agreement (the “Settlement”) which is attached as Exhibit 1 to the Declaration of Virginia Villegas.

2. Approving the allocation of the Gross Settlement Fund to the Settlement Class Members, the Class Representatives, Class Counsel, the LWDA and the Settlement Administrator.

3. Approving the form of the Notice Packet (attached as Exhibit A to the Settlement) and ordering that the Class be given notice of the Settlement and provided with these forms.

4. Conditionally certifying the proposed Class for settlement purposes only.

5. Appointing Plaintiff as Class Representative.

6. Appointing Virginia Villegas, The Villegas Law Firm, APC; and Richard J. Vaznaugh, The Law Office of Richard Vaznaugh as Class Counsel.

7. Appointing RG2 as the Settlement Administrator and authorizing RG2 to send notice of the Settlement to the class members.

8. Setting a briefing schedule for a motion for final approval and award of attorneys’ fees, costs, and class representative award and scheduling a final fairness hearing for a date 120 days after preliminary approval is granted, or such later date as is available for the Court.

Pursuant to California Rules of Court 3.769(d) and (e), this Motion is made on the grounds that the proposed Settlement satisfies all criteria for preliminary approval under California law and was reached following informal and formal discovery and exchange of information and the parties’ participation in a mediation, continued negotiations through the mediator, and subsequent acceptance of a mediator’s proposal. The Settlement is fair, reasonable, and adequate, and Plaintiff

1 and Class Counsel will fairly and adequately represent the class members, all of which warrants
2 preliminary approval by the Court.

3 The Motion is based on this Notice, the accompanying Memorandum of Points and
4 Authorities, the proposed Order; the Declaration of Virginia Villegas In Support of Motion for
5 Preliminary Approval; the Declaration of Richard Vaznaugh In Support of Motion for Preliminary
6 Approval; the Declaration of Kwane Gatlin In Support of Motion for Preliminary Approval; the
7 Declaration of William W. Wickersham regarding the qualifications of the proposed Settlement
8 Administrator and the claim administration process, the Court's record of this action; all matters of
9 which the Court may take notice; and such other and further oral and/or documentary evidence as
10 may be properly presented at the hearing on this matter.

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12 DATED: June 20, 2023

THE VILLEGAS LAW FIRM, APC

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14 THE LAW OFFICE OF RICHARD VAZNAUGH

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16 By: Virginia Villegas
17 Virginia Villegas
18 Attorneys for Plaintiff
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Reservation: RG19015524 - 075310611945

ecourt <noreply@alameda.courts.ca.gov>

Tue 6/13/2023 9:25 AM

To: Karla Donis <karla@e-licenciados.com>

The following reservation has been made by the REQUESTOR.

Event: Motion re: (Preliminary Approval of Settlement)

Reservation ID: 075310611945

PIN: ARSHZJ5TUGYC

Status: RESERVED

Case Number: RG19015524

Case Title: Gatlin VS Anheuser-Busch, LLC

Courthouse: Rene C. Davidson Courthouse

Dept: Department 21

Date: 08-11-2023

Time: 09:00:00 AM

Parties: Kwane Gatlin (Plaintiff)

Motion Count: 1

Click the link below to view the reservation. You may need to supply your PIN number. From here you may print receipt and attach it to the corresponding motion/document as the last page. Indicate the Reservation ID on the motion/document face page. The document will not be accepted without the receipt page and the Reservation ID.

<https://eportal.alameda.courts.ca.gov/?q=calendar/search&crsNumber=075310611945>