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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PAUL GIFFORD, MARY LOU
MOLINA, RANDY MILAND,
KAREN PERRI on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

PETS GLOBAL INC.,
a California Corporation,

Defendant.

Case No. 2:21-cv-02136-CJC-MRW

PLAINTIFFS' NOTICE OF MOTION
OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT

Judge: Hon. Judge Cormac J. Carney

TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that as soon as counsel may be heard by the above-captioned Court, located at 411 West Fourth Street, Courtroom 9 B, Santa Ana, California, 92701, Plaintiffs Paul Gifford, Randy Miland, and Mary Lou Molina ("Plaintiffs"), will hereby move for an order:

1. Approving class preliminary approval of the class action settlement as set forth in the Settlement Agreement attached as Exhibit 1 to the Declaration of J. Hunter Bryson in support of Plaintiffs' Motion for Preliminary

1 Approval of Class Action Settlement (“Bryson Decl.”) attached as Exhibit 1 to
2 the Memorandum of Points and Authority in Support of Plaintiffs’ Motion for
3 Preliminary Approval of Class Action Settlement.

4 2. More specifically, Plaintiffs move for an Order:

- 5 (1) granting preliminary approval of the proposed Settlement;
6 (2) conditionally certifying the Settlement Class for settlement
7 purposes only;
8 (3) approving the parties’ proposed Notice Plan and Class Notice;
9 (4) conditionally appointing Plaintiffs as Class Representatives
10 for the Settlement Class;
11 (5) conditionally appointing the law firm of Milberg Coleman
12 Bryson Phillips Grossman, PLLC as Settlement Class Counsel;
13 (6) conditionally appointing JND Legal Administration as the
14 Settlement Claim Administrator;
15 (7) setting deadlines for any objections to, and/or requests for
16 exclusion from, the proposed Settlement; and
17 (8) setting the schedule for further proceedings as described in
18 Plaintiffs’ Memorandum of Points and Authorities In Support
19 Thereof.

20 3. This motion is unopposed by Defendant. Further, it is based upon
21 the accompanying Memorandum of Points and Authorities, the concurrently
22 filed declaration of J. Hunter Bryson, declaration of Gina M. Intrepido-
23 Bowden, declaration of Frank Bernatowicz, the October, 21 2021 Settlement
24 Agreement with Exhibit, and such evidence and argument as the Court may
25 consider.

1 Dated: April, 4 2022.

Respectfully submitted,

2 /s/ Alex R. Straus

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