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9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 WESTERN DIVISION  
12

13 JOSE JACOBO, et al.,  
14 Plaintiffs,  
15 vs.  
16 ROSS STORES, INC., et al.,  
17 Defendants.  
18

Case No. 2:15-cv-04701-MWF-AGR<sub>x</sub>

**PLAINTIFFS' NOTICE OF  
MOTION AND UNOPPOSED  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT AND  
CERTIFICATION OF  
SETTLEMENT CLASS**

19  
20 Courtroom: 5A – First Street  
Date: October 29, 2018  
21 Time: 10:00 a.m.  
22 Judge: Hon. Michael W. Fitzgerald  
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1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on **October 29, 2018**, at 10:00 a.m., or as  
3 soon thereafter as the matter may be heard, in Courtroom 5A of the United States  
4 District Court for the Central District of California, Western Division, located at 350  
5 West First Street, Los Angeles, California 90012, Plaintiffs Jose Jacobo and Theresa  
6 Metoyer (collectively, "Plaintiffs"), will, and hereby do, respectfully move this  
7 Honorable Court for an order: (1) granting preliminary approval of the settlement  
8 agreement Plaintiffs have executed with Defendant Ross Stores, Inc. ("Defendant")  
9 for \$4,854,000 (Merchandise Credit with cash redemption option, administrative  
10 costs, attorneys' fees and expenses, and incentive awards) pursuant to Fed. R. Civ.  
11 Proc. 23(e); and, (2) certifying a class for settlement purposes pursuant to Fed. R.  
12 Civ. Proc. 23(b)(3).

13 This Motion is unopposed by Defendant and is based upon this Notice of  
14 Motion; Plaintiffs' Memorandum of Points and Authorities In Support of Plaintiffs'  
15 Unopposed Motion for Preliminary Approval of Class Action Settlement and  
16 Certification of Settlement Class; the Declaration of Christopher J. Morosoff in  
17 support thereof; the Declaration of Douglas Caiafa in support thereof; the Declaration  
18 of Julie N. Green in support thereof; the Declarations of Plaintiffs; all filed and  
19 served concurrently herewith; as well as the pleadings and papers on file in this  
20 action, argument of counsel, any other material which may be submitted to the Court,  
21 and any other evidence or argument the Court may consider.

22 Dated: September 18, 2018

23 Respectfully submitted,  
LAW OFFICE OF CHRISTOPHER J. MOROSOFF

24  
25 By: /s/ Douglas Caiafa  
26 Douglas Caiafa  
27 Attorneys for Plaintiffs  
JOSE JACOBO, et al.