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2 Ex Kano S. Sams II (SBN 192936)
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10 Counsel for Lead Plaintiff Turton Inc.

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 IVAN BARON, Individually and on
14 Behalf of All Others Similarly Situated,

15 Plaintiff,

16 v.

17 HYRECAR INC., JOSEPH FURNARI
18 and ROBERT SCOTT BROGI,

19 Defendants.

Case No. 2:21-cv-06918-FWS-JC

**LEAD PLAINTIFF’S NOTICE OF
UNOPPOSED MOTION AND
MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT
AND PLAN OF ALLOCATION**

Hearing Date: November 14, 2024

Hearing Time: 10:00 a.m.

Location: Courtroom 10D

Judge: Fred W. Slaughter

1 **TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 PLEASE TAKE NOTICE that, pursuant to ECF No. 128, on November 14,
4 2024, at 10:00 a.m., or as soon thereafter as the Parties¹ may be heard by the
5 Honorable Fred W. Slaughter, in Courtroom 10D, located at the United States
6 Courthouse, 411 West 4th Street, Santa Ana, CA 92701, Court-appointed lead
7 plaintiff Turton Inc. (“Lead Plaintiff”) will, and hereby does, move the Court for
8 entry of an Order: (i) granting final approval of the Settlement in the above-
9 captioned action on the terms set forth in the Stipulation; and (ii) approving the
10 proposed Plan of Allocation for distribution of the Net Settlement Fund.

11 This motion is based upon the accompanying Memorandum of Law, the
12 Declaration of Ex Kano S. Sams II in Support of: (I) Lead Plaintiff’s Motion for
13 Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead
14 Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of
15 Litigation Expenses, all the documents and exhibits in support thereof, as well as all
16 the pleadings and papers on file in this matter and any further evidence and
17 argument as may be presented at the hearing.

18 Lead Counsel conferred with Defendants’ Counsel with respect to this
19 motion. Defendants’ counsel has authorized Lead Counsel to represent that
20 Defendants do not oppose this motion.

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¹ All capitalized terms, unless otherwise defined herein, have the same meaning as
27 set forth in the Stipulation and Agreement of Settlement dated March 20, 2024 (the
28 “Stipulation”; ECF No. 121-1).

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DATED: October 10, 2024

GLANCY PRONGAY & MURRAY LLP

By: s/ Ex Kano S. Sams II

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Counsel for Lead Plaintiff Turton Inc.

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PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On October 10, 2024, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Central District of California, for receipt electronically by the parties listed on the Court’s Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 10, 2024.

s/ Ex Kano S. Sams II

Ex Kano S. Sams II