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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

IRENE PARRY, individually and on behalf of
all others similarly situated; JEANETTE
O’SULLIVAN, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

FARMERS INSURANCE EXCHANGE;
TRUCK INSURANCE EXCHANGE; FIRE
INSURANCE EXCHANGE.; FARMERS
GROUP, INC.; and DOES 1-100,

Defendants.

Case No.: BC683856

Hon. Amy Hogue, SS Dept. 007

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

DATE: March 8, 2022

TIME: 2:00 p.m.

DEPT: SS 007

COMPLAINT FILED: November 16,
2017

Trial Date: Not Set

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

2 PLEASE TAKE NOTICE that, on March 8, 2022, at 2:00 p.m. in Department 7 of the
3 Los Angeles Superior Court, Spring Street Courthouse, located at 312 North Spring Street, Los
4 Angeles, CA 90012, before the Hon. Amy Hogue, Plaintiffs, on behalf of themselves and on behalf
5 of the Class (“Plaintiffs”), will and hereby do move for an order granting preliminary approval of
6 a settlement between Plaintiffs and Defendants in the above-entitled action.

7 Through this Motion, brought pursuant to Rule 3.769 of the California Rules of Court,
8 Plaintiffs seek an Order from the Court:


- 9 (1) Granting Preliminary Approval to the Proposed Class Action Settlement;
10 (2) Certifying the Settlement Class for settlement purposes only;
11 (3) Approving the Form and Manner of Notice;
12 (4) Appointing a Settlement Administrator;
13 (5) Establishing a schedule for the provision of Notice of, the opportunity to opt out of,
14 and the opportunity to object to the Settlement to the Members of the Class; and
15 (6) Setting the Final Approval Hearing.

16 This Motion will be based on this Notice of Motion and Motion, the concurrently filed
17 Memorandum of Points and Authorities, the concurrently filed Declaration of Charles J. Crueger
18 and the Exhibits thereto, and the concurrently lodged [Proposed] Order Granting Preliminary
19 Approval and Exhibits thereto, and on the entire record in the proceedings and on such oral
20 argument as the Court may permit.

21 Defendants have authorized Plaintiffs to state that they do not oppose this motion.

22
23 February 10, 2022

Respectfully submitted,

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25 Charles J. Crueger (PHV)

26 Erin K. Dickinson (PHV)

27 Krista K. Baisch (PHV)

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PROOF OF SERVICE

I, the undersigned, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 601 S. Figueroa St., Suite 2050, Los Angeles, California 90017.

On February 10, 2022 I served the foregoing documents described as follows:

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

on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as stated on the attached service list, and in the manner stated below:

 BY MAIL:

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

 BY PERSONAL SERVICE: I caused to be delivered such envelope by hand to the offices of:

 X BY EMAIL: **NANCY B. ANFANGER**

 X BY ELECTRONIC SERVICE

served by e-mail through Case Anywhere: I attached a true and correct copy of the above-entitled document(s) to Case Anywhere by electronic transfer for service on all counsel of record by electronic service pursuant to the Order Authorizing Electronic Service. This service complies with C.C.P. §1010.6.

 X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

 (Federal) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed February 10, 2022 at Los Angeles, California.

 Karina Torres
(Type of Print Name)

 Karina Torres
(Signature)

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SERVICE LIST
PARRY v FARMERS INSURANCE EXCHANGE
Case No. BC 683856

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