

SCOTT COLE & ASSOCIATES, APC  
ATTORNEYS AT LAW  
555 12<sup>TH</sup> STREET, SUITE 1725  
OAKLAND, CA 94607  
TEL: (510) 891-9800

1 Scott Edward Cole, Esq. (S.B. #160744)  
2 Laura Grace Van Note, Esq. (S.B. #310160)  
3 **SCOTT COLE & ASSOCIATES, APC**  
4 555 12<sup>th</sup> Street, Suite 1725  
5 Oakland, California 94607  
6 Telephone: (510) 891-9800  
7 Facsimile: (510) 891-7030  
8 Email: scole@scalaw.com  
9 Email: lvannote@scalaw.com  
10 Web: www.scalaw.com

11 Attorneys for Representative Plaintiffs,  
12 Aggrieved Employees and the Plaintiff Class

13 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **IN AND FOR THE COUNTY OF SACRAMENTO**

15 MAGED HAKEEM, SHERIF HAKEEM  
16 and BARBARA SANCHEZ, individually,  
17 and on behalf of all others similarly  
18 situated,

19 Plaintiffs,

20 vs.

21 UNIVERSAL PROTECTION SERVICE,  
22 LP and DOES 1 through 100, inclusive,

23 Defendants.

Case No. 34-2019-00270901

**CLASS ACTION**

**AMENDED NOTICE OF MOTION;  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF  
PLAINTIFFS' MOTION FOR AN ORDER:**

- (1) GRANTING FINAL APPROVAL OF CLASS ACTION SETTLEMENT;
- (2) AWARDING ATTORNEYS' FEES AND COSTS TO CLASS COUNSEL;
- (3) AWARDING ENHANCEMENT TO THE REPRESENTATIVE PLAINTIFFS; AND
- (4) AWARDING REIMBURSEMENT OF SETTLEMENT ADMINISTRATION COSTS

Date: July 14, 2020

Time: 2:00 p.m.

Dept.: 53

**AMENDED NOTICE OF MOTION**

24 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD, NOTICE IS**  
25 **HEREBY GIVEN** that, pursuant to the Notice Resetting Previously Set Motion attached as  
26 Exhibit "A", on July 14, 2020 at 2:00 p.m., or as soon thereafter as the matter may be heard in  
27 Department 53 of the above-entitled Court, located at 813 6th Street, Sacramento, CA 95814,  
28

SCOTT COLE & ASSOCIATES, APC  
ATTORNEYS AT LAW  
555 12<sup>TH</sup> STREET, SUITE 1725  
OAKLAND, CA 94607  
TEL: (510) 891-9800

1 Representative Plaintiffs Maged Hakeem, Sherif Hakeem and Barbara Sanchez will and hereby do  
2 apply to this Court for an Order:

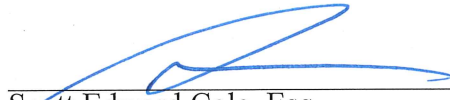
- 3 1. Granting final approval of class action settlement agreement;  
4 2. Awarding attorneys' fees and costs to Class Counsel;  
5 3. Awarding Enhancement/Service payments to the Representative Plaintiffs; and  
6 4. Awarding reimbursement of settlement administration fees and costs.

7 This Motion is based upon this Notice of Motion and Motion, the accompanying  
8 Memorandum of Points and Authorities, the Declaration of Scott Edward Cole, Esq. and exhibits  
9 thereto, the Declarations of class representatives Maged Hakeem, Sherif Hakeem and Barbara  
10 Sanchez, the Declaration of Christina Samaniego, the Declaration of Alan Garrido (CPT Group),  
11 the complete files and records of this action, and any oral argument and documentary evidence as  
12 may be presented to the Court at the hearing of this Motion.

13 Pursuant to Local Rule 1.06 (A), the Court will make a tentative ruling on the merits of this  
14 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings  
15 for the Department may be downloaded off the Court's website. If the party does not have online  
16 access, they may call the dedicated phone number for the department as referenced in the local  
17 telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the  
18 hearing and receive the tentative ruling. If you do not call the Court and the opposing party by 4:00  
19 p.m. the court day before the hearing, no hearing will be held.

21 Dated: June 4, 2020

**SCOTT COLE & ASSOCIATES, APC**

22  
23 By:   
24 Scott Edward Cole, Esq.  
25 Attorneys for Representative Plaintiffs,  
26 Aggrieved Employees and the Plaintiff Class  
27  
28

# **EXHIBIT A**

**SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF SACRAMENTO  
GORDON D SCHABER COURTHOUSE**

**MINUTE ORDER**

DATE: 05/27/2020

TIME: 02:00:00 PM

DEPT: 53

JUDICIAL OFFICER PRESIDING: David Brown

CLERK: J. Gable

REPORTER/ERM:

BAILIFF/COURT ATTENDANT:

CASE NO: **34-2019-00270901-CU-OE-GDS** CASE INIT.DATE: 12/09/2019

CASE TITLE: **Hakeem vs. Universal Protection Service, LP**

CASE CATEGORY: Civil - Unlimited

---

**APPEARANCES**

---

**Nature of Proceedings: Notice Resetting Previously Set Motion**

The Motion for Final Approval of Class Settlement previously set for June 8, 2020 has been reset to July 14, 2020 in department 53 at 2:00p.m.

Moving party is ordered to file and serve an Amended Notice of Motion with attached proof of service for the above-entitled motion. The Amended Notice of Motion shall include a copy of this order and shall also provide notice of the Court's tentative ruling system, as required by Local Rule 1.06.

Moving party must serve the Amended Notice of Motion as provided by law no more than 10 calendar days after the date of this order. Moving party shall file the Amended Notice of Motion and proof of service no less than 10 calendar days before the new hearing date.

Failure to file the Amended Notice of Motion and proof of service no less than 10 calendar days prior to the new hearing date may result in the above-entitled motion being dropped from the Court's calendar.