

BURSOR & FISHER, P.A.

L. Timothy Fisher (State Bar No. 191626)
Yeremey O. Krivoshey (State Bar No.295032)
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
Email: ltfisher@bursor.com
ykrivoshey@bursor.com

BURSOR & FISHER, P.A.

Scott A. Bursor (State Bar No. 276006)
2665 S. Bayshore Dr., Suite 220
Miami, FL 33133
Telephone: (305) 330-5512
Facsimile: (305) 676-9006
E-Mail: scott@bursor.com

Class Counsel

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MIKE CORTES, on Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

NATIONAL CREDIT ADJUSTERS, L.L.C.,

Defendant.

Case No. 2:16-cv-00823-MCE-EFB

**PLAINTIFF’S NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: April 30, 2020
Time: 2:00 p.m.
Courtroom: 7

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on April 30, 2020 at 2:00 p.m. or as soon thereafter as
3 counsel may be heard by the above-captioned Court, located at 501 I Street, Courtroom 7 – 14th
4 Fl., Sacramento, CA 95814, in the courtroom of Judge Morrison C. England, Plaintiff Mike Cortes
5 will move and hereby does move pursuant to Federal Rule of Civil Procedure 23(e) for the Court
6 to: (1) grant preliminary approval of the proposed Settlement Agreement, (2) establish procedures
7 for giving notice to members of the Settlement Class, (3) establish procedures for giving notice to
8 members of the Settlement Class, (4) approve forms of notice to Settlement Class Members, (5)
9 mandate procedures and deadlines for exclusion requests and objections, and (6) set a date, time,
10 and place for a final approval hearing.

11 This motion is made on the grounds that preliminary approval of the proposed class action
12 settlement is proper, given that each requirement of Rule 23(e) has been met.

13 This motion is based on this notice of motion and motion, on the Memorandum of Points &
14 Authorities, the Declarations of Yeremey Krivoshey, William Wickersham, and Plaintiff Mike
15 Cortes, the files and pleading in this action and such other and further material as may be elicited at
16 the hearing on this motion.

17
18 Dated: March 23, 2020

BURSOR & FISHER, P.A.

19 By: /s/ Yeremey Krivoshey
20 Yeremey Krivoshey

21 L. Timothy Fisher (State Bar No. 191626)
22 Yeremey O. Krivoshey (State Bar No.295032)
23 1990 North California Blvd., Suite 940
24 Walnut Creek, CA 94596
25 Telephone: (925) 300-4455
26 Facsimile: (925) 407-2700
27 Email: ltfisher@bursor.com
28 ykrivoshey@bursor.com

BURSOR & FISHER, P.A.
Scott A. Bursor (State Bar No. 276006)
2665 S. Bayshore Dr., Suite 220
Miami, FL 33133
Telephone: (305) 330-5512

Facsimile: (305) 676-9006
E-Mail: scott@bursor.com

Class Counsel

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28