

E-FILED  
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Superior Court of California  
County of Fresno  
By: Estela Gonzalez, Deputy

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16 **IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
17 **IN AND FOR THE COUNTY OF FRESNO**

18 MANMOHAN DHILLON, dba RANCHOS  
19 VALERO, SATNAM PABLA, dba GMG  
20 FOOD STORE 101 and MADERA AVE.  
21 MARKET, SERGE HAITAYAN, dba 7-11  
22 NUMBER 17906b, DALJIT SINGH, dba  
23 LIQUOR MAX, and PAR VENTURES, LLC,  
24 dba, QUICK PICK, on Their Own Behalves  
25 and on Behalf of All Others Similarly Situated  
26 and on Behalf of the General Public,

27 Plaintiffs,

28 v.

ANHEUSER-BUSCH, LLC, DONAGHY  
SALES, LLC, a California Corporation;  
ANHEUSER-BUSCH DOES 1-5 and DOES  
6 through 50, inclusive,

Defendants.

CASE NO. 14CECG03039 JMS

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

JUDGE: Honorable Jonathan M. Skiles

DATE: January 17, 2024

TIME: 3:30PM

DEPT: 403

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on January 17, 2024, at 3:30PM, or as soon as the matter can be  
3 heard, in the courtroom of the Honorable Jonathan M. Skiles, located in Department 403 of the  
4 above-entitled Court, located in the B.F. Sisk Court at 1130 O Street, Fresno, California 93724,  
5 Plaintiffs Manmohan Dhillon, dba Ranchos Valero, Satnam Pabla, dba GMG Food Store 101 and  
6 Madera Market, Serge Haitayan, dba 7-11 Number 17906b, Daljit Singh, dba Liquor Max and Par  
7 Ventures, LLC, dba Quick Pick (“Plaintiffs”), by and through their attorneys of record, will move  
8 this Court, for an Order:

- 9 1. Preliminarily approving the proposed Class Action Settlement;
- 10 2. Certifying the proposed Settlement Class and appointing representatives and  
11 counsel for the proposed Settlement Class;
- 12 3. Setting the procedures and a schedule for Class Members to request exclusion  
13 (“opt out”) of the Settlement Class or to object to the proposed Class Action  
14 Settlement and/or the applications for attorneys’ fees and expenses and service  
15 awards to the Representative Plaintiffs, and the plan for the allocation of net  
16 settlement proceeds among the class members who do not opt out of the  
17 Settlement Class (the “related applications”)
- 18 4. Setting a briefing schedule for a Plaintiffs’ Motion for Final Approval of the  
19 proposed Class Action Settlement and related applications;
- 20 5. Setting a hearing date at which Final Approval of the proposed Class Action  
21 Settlement and related applications will be considered by the Court;
- 22 6. Approving the form of notice and manner of dissemination of notice to the  
23 Settlement Class of the proposed Settlement and the related applications, the  
24 manner and schedule for requesting exclusion from the class or objecting to the  
25 proposed Settlement and/or related applications, and the Final Approval hearing;  
26 and
- 27 7. Appointing Gilardi & Co. as administrator of the Notice Plan, settlement website,  
28 and, if the Settlement is approved, administration of the claims procedures and

1 distribution of net settlement proceeds to Class Members according to the plan of  
2 allocation.

3 This Unopposed Motion is based on this Notice of Motion, the accompanying Plaintiffs'  
4 Memorandum in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class  
5 Action Settlement, the Declaration of Dennis Stewart In Support of Plaintiffs' Motion for  
6 Preliminary Approval of Class Action Settlement, the Declaration of Peter Crudo In Support of  
7 Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and all the  
8 exhibits attached thereto, the complete file and record in this action, the oral arguments of counsel,  
9 and upon such other matters as may be properly submitted to the Court, either before or during the  
10 hearing on this Motion.

11  
12 Respectfully submitted,

13  
14 DATED: November 14, 2023

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/s/ Dennis Stewart  
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