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*Attorneys for Plaintiff and the Proposed
Settlement Class*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF CONTRA COSTA**

STAR JOSHUA, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

THE COUNTY OF CONTRA COSTA; MARC
SHORR, in his official capacity; and DOES 1
through 100, inclusive,

Defendants.

Case No. C23-01684

*[Assigned for All Purposes to:
Dept. 39, Hon. Edward G. Weil]*

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

Date: 07/10/25

Time: 9:00a

Dept. 39

Judge: Hon. Edward G. Weil

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

2 **PLEASE TAKE NOTICE THAT** on _____, 2025, at _____ am/pm (PST),
3 in Department 39, located at 725 Court Street Martinez, CA 94553, before the Honorable Edward G. Weil,
4 Plaintiff will and hereby does move for an order will move the Court, pursuant to California Civil
5 Procedure Code § 382 and California Rule of Court 3.769, for an order:

6 1. Preliminarily approving the parties' proposed class action settlement agreement of this
7 matter (the "Settlement Agreement") pursuant to California Rules of Court, rule 3.769(c) (a copy of the
8 fully executed Settlement Agreement is attached as **Exhibit B** to the concurrently filed Declaration of M.
9 Anderson Berry);

10 2. Certifying, for the purposes of settlement pursuant to California Rules of Court, rule
11 3.768(d), the Settlement Class defined as follows: "all persons with California mailing addresses who
12 were mailed a letter sent from Defendant County entitled "NOTICE OF DATA BREACH" on or about
13 May 10, 2023."¹

14 3. Appointing Plaintiff as the Settlement Class Representative; Appointing M. Anderson
15 Berry, Clayeo C. Arnold, APC; and Kenneth Grunfeld of Kopelowitz Ostrow P.A., as Class Counsel;

16 4. Approving the form, method, and timing of giving notice to the Settlement Class of this
17 action and the proposed Settlement Agreement pursuant to California Rules of Court, rule 3.769(f) (a copy
18 of the proposed class notices are attached as **Exhibits A and B** to the Settlement Agreement); and

19 5. Setting a hearing date for final approval of the Settlement and Class Counsel's application
20 for an award of attorneys' fees and expenses pursuant to California Rules of Court, rule 3.769(e) and
21 service awards for Plaintiff.

22 This motion is based upon this notice of motion and motion, the concurrently filed memorandum
23 of points and authorities in support of the unopposed motion, the concurrently filed Declaration of M.
24 Anderson Berry (attaching as exhibits, *inter alia*, the parties' fully executed proposed Settlement
25 Agreement and the proposed class notices), the concurrently filed declaration of Plaintiff, the concurrently

26 ¹ Excluded from the Settlement Class are: (i) Defendant County's County Board of Supervisors ("Board")
27 and/or the Related Entities; (ii) all Settlement Class Members who timely and validly request exclusion
28 from the Settlement Class; and (iii) the members of the judiciary who have presided or are presiding over
this matter and their families and staff.

1 filed proposed order, the concurrently filed Declaration of Ryan Aldridge and exhibit thereto, the records
2 and files in this action, and such arguments as may be presented at the hearing on this motion.

3 The relief sought in Plaintiff's motion and in this proposed order is unopposed by Defendants.

4 DATED: April 3, 2025

Respectfully submitted,

5 **CLAYEO C. ARNOLD**
6 **A PROFESSIONAL CORPORATION**

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8 By: /s/ M. Anderson Berry
9 M. Anderson Berry, Esq.
10 *Attorneys for Plaintiff and the Putative Class*
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PROOF OF SERVICE

I, Lori Martin, declare and state:

I am a citizen of the United States, over 18 years of age, employed in the county of Sacramento, and not a party to the within action. My business address is 865 Howe Avenue, Sacramento, CA 95825.

On the date set forth below, I served the following on the parties in said action by the means indicated below:

1. **PLAINTIFF'S NOTICE OF MOTION AND UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;**
2. **PLAINTIFF'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;**
3. **DECLARATION OF M. ANDERSON BERRY IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;**
4. **DECLARATION OF PLAINTIFF STAR JOSHUA IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;**
5. **DECLARATION OF RYAN ALDRIDGE REGARDING ADMINISTRATION QUALIFICATIONS AND NOTICE PROCEDURES IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT; and**

[X] **(BY TRANSMITTING VIA EMAIL OR ELECTRONIC TRANSMISSION)** the document(s) listed above to the addressees listed below at the email addresses indicated, from lori@justice4you.com:

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Counsel for Defendant, Contra Costa County

1 I declare under penalty of perjury under the laws of the state of California that the foregoing is
2 true and correct. Executed on April 3, 2025, at Sacramento, California.

3 /s/ Lori Martin

4 Lori Martin
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