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9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 WESTERN DIVISION

12 LUCAS R., *et al.*,

13 Plaintiffs,

14 v.

15 XAVIER BECERRA, Secretary of  
16 U.S.

17 Department of Health and Human  
18 Services, *et al.*,

19 Defendants.

No. 2:18-CV-05741 DMG PLA

NOTICE OF JOINT MOTION FOR  
PRELIMINARY APPROVAL OF  
SETTLEMENTS AND APPROVAL OF  
CLASS NOTICES OF SETTLEMENT OF  
PLAINTIFFS' THIRD, FOURTH, AND  
FIFTH CLAIMS FOR RELIEF  
[PSYCHOTROPIC MEDICATIONS,  
LEGAL REPRESENTATION, AND  
DISABILITY]

HEARING: JANUARY 5, 2024

TIME: 10:00 A.M.

PLACE: COURTROOM 8C, 8<sup>TH</sup> FLOOR

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1 Please take notice that on January 5, 2024, at 10:00 a.m. or as soon thereafter as  
2 counsel may be heard, the Parties will and do hereby jointly move the Court for entry  
3 of an order (1) preliminarily approving their Settlement Agreements; (2) approving  
4 the form and manner of the Notices of Proposed Class Action Settlement; (3) setting  
5 the deadline for written submissions from Class Members or their legal  
6 representatives or advocates who wish to be heard in favor of or in objection to the  
7 Agreements; (4) setting a schedule for Plaintiffs to file their motion for fees and costs;  
8 and (5) setting the date for a final fairness hearing pursuant to Federal Rule of Civil  
9 Procedure 23(e)(2).

10 This motion is based upon the memorandum of law, declaration of Mishan  
11 Wroe in support of the motion, and exhibits filed concurrently herewith, as well as all  
12 other matters of record.

13 This motion is made following a conference of counsel under Local Rule 7-3  
14 and paragraph 4.b of the Court's initial standing order, which took place on November  
15 8, 2023.

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1 Dated: November 14, 2023

Respectfully submitted,

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3 MISHAN WROE

4 *One of the attorneys for Plaintiffs*

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1 Dated: November 14, 2023

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\*Signed with consent of counsel

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