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18 *Attorneys for Plaintiff John Blaha,*
 19 *Individually and on Behalf of Others Similarly Situated*

20 **UNITED STATES DISTRICT COURT**
 21 **CENTRAL DISTRICT OF CALIFORNIA**

22 John Blaha,* individually and on behalf of
 23 others similarly situated,

24 Plaintiff,

25 v.

26 Rightscorp, Inc., a Nevada corporation,
 27 f/k/a Stevia Agritech Corp.; Rightscorp,
 28 Inc., a Delaware corporation; Christopher
 Sabec; Robert Steele; Craig Harmon;
 Dennis J. Hawk; BMG Rights Management
 (US) LLC; Warner Bros. Entertainment
 Inc.; and John Does 1 to 10,

Defendants.

Case No.: 2:14-cv-9032-DSF-(JCGx)

Assigned to: Hon. Dale S. Fischer
 United States District Judge

**NOTICE OF MOTION FOR
 PRELIMINARY APPROVAL OF
 CLASS ACTION SETTLEMENT**

Date: February 8, 2016

Time: 1:30 p.m.

Courtroom: 840

Complaint Filed: November 21, 2014

Trial Date: Not yet set

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

2 **PLEASE TAKE NOTICE** that on February 8, 2016, at 1:30 p.m., or as soon
3 thereafter as the matter may be heard before Honorable Dale S. Fischer, located at
4 Courtroom 840, United States District Court, 255 East Temple Street, Los Angeles,
5 California 90012, Plaintiff John Blaha (“Plaintiff”) will and hereby does move for an
6 Order granting preliminary approval of the class action settlement (“Settlement”).
7 Specifically, Plaintiff applies to this Court for an order (i) granting preliminary approval
8 of the Parties’ proposed Settlement; (ii) certifying the proposed Settlement Class for
9 settlement purposes; (iii) approving the form and content of the notice to the members of
10 the Settlement Class; (iv) appointing Plaintiff as Class Representative; (v) appointing his
11 counsel as Class Counsel; (vi) scheduling a final fairness hearing; and (vii) providing
12 other relief as the Court deems reasonable and just.

13 This Motion is made following conference of counsel pursuant to L.R. 7-3, and
14 Defendants do not oppose this Motion.

15 This Motion is based upon this Notice of Motion and Motion, the accompanying
16 Memorandum of Points and Authorities, all pleadings, records and papers filed in this
17 action, the argument of counsel, any supplemental memoranda that may be filed by the
18 parties, and such further evidence as the Court may consider at or before the hearing of
19 this Motion.

20
21 DATED: January 11, 2015

ROXBOROUGH, POMERANCE, NYE &
ADREANI, LLP

22
23 /s/ JESSE B. LEVIN

24 _____
25 DREW E. POMERANCE
26 JESSE B. LEVIN

27 *Attorneys For Plaintiff*
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