

**Kazerouni Law Group, APC**  
Costa Mesa, California

1 **KAZEROUNI LAW GROUP, APC**  
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11 **UNITED STATES DISTRICT COURT**  
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 **SUZANNE ALAEI, Individually**  
14 **And On Behalf Of All Others**  
15 **Similarly Situated,**

16 **Plaintiff,**

17 **v.**

18 **H.J. HEINZ COMPANY, L.P., and**  
19 **KRAFT HEINZ FOODS**  
20 **COMPANY,**

21 **Defendants.**

Case No.: 15-cv-02961-MMA-DHB  
**NOTICE OF SETTLEMENT**

**Kazerouni Law Group, APC**  
Costa Mesa, California

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**TO THIS COURT AND TO ALL PARTIES AND THEIR  
RESPECTIVE ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that the parties have settled the action on an individual basis. Plaintiff respectfully requests that the Court set a deadline of no earlier than October 28, 2016 for the parties to file a joint motion to dismiss.

Respectfully submitted,

Dated: September 13, 2016

**KAZEROUNI LAW GROUP, APC**

BY: /s/ JASON A. IBEY  
JASON A. IBEY, ESQ.  
ATTORNEY FOR PLAINTIFF

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Costa Mesa, California

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**PROOF OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Kazerouni Law Group, APC, 245 Fischer Avenue, Suite D1, Costa Mesa, California 92626. On September 13, 2016 I served the within document(s):

**NOTICE OF SETTLEMENT**

- CM/ECF - by transmitting electronically the document(s) listed above to the electronic case filing system on this date before 11:59 p.m. The Court's CM/ECF system sends an e-mail notification of the filing to the parties and counsel of record who are registered with the Court's CM/ECF system.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 13, 2016, at Costa Mesa, California.

        /s/ Jason A. Ibey          
JASON A. IBEY