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Attorneys for Plaintiff Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

RIBALDO OLVERA and IGNACIO
GOMEZ individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

AMERICAN CORPORATE SECURITY, A
California Corporation; AMERICAN
CORPORATE SECURITY INC.; and DOES
1-50,

Defendants.

Case No. 21STCV16417

[Related to Case No: 21STCV26885]

*[Assigned for all purposes to the Hon. Carolyn B.
Kuhl; Dept. 12]*

**NOTICE OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT,
APPROVAL OF CLASS NOTICE, SETTING
OF FINAL APPROVAL HEARING DATE**

Date: May 28, 2026
Time: 10:30 a.m.
Dept.: SSC12

1 **TO DEFENDANT AND TO DEFENDANT’S ATTORNEYS OF RECORD:**

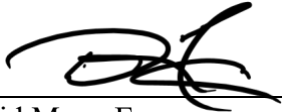
2 **PLEASE TAKE NOTICE** that on May 28, 2026 at 10:30 a.m. in Department 12 of the Los
3 Angeles County Superior Court, located at 312 North Spring Street, Los Angeles, California 90012,
4 before the Honorable Carolyn B. Kuhl, Plaintiff RIBALDO OLVERA, Plaintiff IGNACIO GOMEZ,
5 and the certified class (“Plaintiff Class”) will and hereby does move the Court for Preliminary
6 Approval of Class and PAGA Action Settlement, Approval of Class Notice, and Setting of Final
7 Approval Hearing Date.

8 This motion will be based on this Notice, the Memorandum of Points and Authorities in
9 Support, the Declarations of David Mara, Esq., James R. Hawkins, Esq., Plaintiff RIBALDO
10 OLVERA, Plaintiff IGNACIO GOMEZ, and any and all documents filed in this matter, and any oral
11 argument that may be presented at the hearing, and upon such other matters as this Court may consider.

12 **MARA LAW FIRM, PC**

13
14 Date: April 9, 2026

By: _____


David Mara, Esq.
Carter Cordura, Esq.
Attorneys for Plaintiff Class