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Attorneys for Plaintiff Maria De Jesus Romero,
individually, and on behalf of all other similarly
situated employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE– CIVIL COMPLEX CENTER**

MARIA DE JESUS ROMERO, as an
individual, and on behalf of other similarly
situated employees,

Plaintiff,

vs.

MARUCHAN, INC., a California
corporation, EMPLOYBRIDGE, LLC, a
California corporation, REAL TIME
STAFFING SERVICES, LLC, a California
corporation and DOES 1-50, inclusive,

Defendant.

Case No.: 30-2020-01155487-CU-OE-CXC

Assigned for all purposes to:
Hon. Peter Wilson
Dept. CX 101

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

Date: April 20, 2023
Time: 2:00 p.m.
Place: Department CX 101

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on April 20, 2023 at 2:00 p.m., or as soon thereafter as
3 counsel may be heard, in Department CX 101 of the above-captioned court, located at 751 W Santa
4 Ana Blvd, Santa Ana, CA 92701, the Honorable Peter Wilson, presiding, Plaintiff Maria De Jesus
5 Romero will, and hereby does, move this Court to:

6 1. Preliminarily approve the settlement described in the Stipulation of Class Action
7 Settlement (attached as **Exhibit A** to the Declaration of Armond M. Jackson), which contains the
8 principal terms of the class action settlement between Plaintiff Maria De Jesus Romero and Defendants
9 Maruchan, Inc., Employbridge, LLC, and Real Time Staffing Services, LLC (collectively referred to
10 herein as “Defendants”);

11 2. Conditionally certify the proposed Settlement Class;

12 3. Approve distribution of the proposed Notice of Class Action and Exclusion Form.

13 4. Appoint Plaintiff Maria De Jesus Romero as the class representative;

14 5. Appoint Jackson Law, APC as class counsel;

15 6. Appoint Simpluris, Inc. as the settlement administrator; and

16 7. Set a hearing date for final approval of the settlement.

17 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
18 Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3)
19 the Declaration of Armond M. Jackson; (4) the declaration of Maria De Jesus Romero; (5) the Notice of
20 Class Action Settlement; (6) the [Proposed] Order Granting Preliminary Approval of the Stipulation of
21 Class Action Settlement; (7) the records, pleadings, and papers filed in this action; and (8) such other
22 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of
23 this Motion.

24 Dated: March 20, 2023

Respectfully submitted,

25 By: /s/ Armond M. Jackson

26 Armond M. Jackson, Esq.

Andrea M. Fernandez-Jackson, Esq.

27 Anthony S. Filer Jr., Esq.

JACKSON LAW, APC

28 Attorneys for Plaintiff Maria De Jesus Romero and
all other similarly situated employees