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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 27, 2023
Time: 2:00 p.m.
Place: Department CX 101

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

3 **PLEASE TAKE NOTICE** that on April 27, 2023 at 2:00 p.m., or as soon thereafter as
4 counsel may be heard, in Department CX 101 of the above-captioned court, located at 751 W Santa
5 Ana Blvd, Santa Ana, CA 92701, the Honorable Peter Wilson, presiding, Plaintiff Maria De Jesus
6 Romero will, and hereby does, move this Court to:

7 1. Preliminarily approve the settlement described in the Stipulation of Class Action
8 Settlement (attached as **Exhibit A** to the Declaration of Armond M. Jackson), which contains the
9 principal terms of the class action settlement between Plaintiff Maria De Jesus Romero and
10 Defendants Maruchan, Inc., Employbridge, LLC, and Real Time Staffing Services, LLC
(collectively referred to 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 30, 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