

DANIEL F. GAINES (SBN 251488)
daniel@gaineslawfirm.com
ALEX PAUL KATOFISKY (SBN 202754)
alex@gaineslawfirm.com
GAINES & GAINES, APLC
4550 E. Thousand Oaks Blvd., Ste 100
Westlake Village, CA 91362
Telephone: (818) 703-8985
Facsimile: (818) 703-8984

Attorneys for Plaintiffs,
JENICA COLE and SHAUNA ADAMS, and all others similarly situated
(Additional attorneys for parties on following page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF YOLO
(UNLIMITED JURISDICTION)

JENICA COLE, SHAUNA ADAMS,
KASSANDRA MENDIVIL, RICHARD
BAUTISTA, MICHAEL NEVAREZ, JOE
NUNEZ, and HUNTER MEELEE, on behalf of
themselves and all others similarly situated, and
as “aggrieved employees” on behalf of other
“aggrieved employees” under the Labor Code
Private Attorneys General Act of 2004,

Plaintiff(s),

vs.

STRATEGIC GREEN PARTNERS LLC
DOING BUSINESS AS AUTHENTIC 760, a
California limited liability company; IGS
SOLUTIONS LLC, a California limited liability
company; SHRYNE GROUP, INC., a California
corporation; STIIIZY, LLC, a California limited
liability company; IRONWORKS
COLLECTIVE, INC., DOING BUSINESS AS
BLAZE, a California corporation; TONY
HUANG, an individual; and DOES 1–50,
inclusive,

Defendant(s).

Case No. CV2021-0426

**PLAINTIFFS KASSANDRA
MENDIVIL, RICHARD BAUTISTA,
JENICA COLE, SHAUNA ADAMS,
MICHAEL NEVAREZ, JOE NUNEZ,
AND HUNTER MEELEE’S NOTICE
OF MOTION AND UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: February 9, 2024
Hearing Time: 9:00 a.m.
Hearing Dept.: 14, The Honorable David
Rosenberg

Action filed: March 12, 2021

**Submitted Herewith Under Separate
Cover:**

1. Memorandum of Points and
Authorities;
2. Declaration(s) of David Spivak, Daniel
F. Gaines, Harout Messrelian, Chantal

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Renee McCoy Payton, Marcus Joseph
Bradley, Matthew Mann, Frank H.
Kim, Helen Kim, and Walter L. Haines;
and
3. [Proposed] Order

1 **ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)**

2
3 JOSEPH TOJARIEH (SBN 265492)
jft@stonebrooklaw.com
4 STONEBROOK LAW
10250 Constellation Boulevard, Suite 100
5 Los Angeles, CA 90067
Telephone: (310) 553-5533 ext. 101
6 Facsimile: (310) 553-5536

7 Attorneys for Plaintiff(s),
8 JENICA COLE and SHAUNA ADAMS, and all others similarly situated

9 DAVID G. SPIVAK (SBN 179684)
david@spivaklaw.com
10 MAYA CHEAITANI (SBN 335777)
maya@spivaklaw.com
11 THE SPIVAK LAW FIRM
12 8605 Santa Monica Bl
13 PMB 42554
West Hollywood, CA 90069
14 Telephone: (213) 725-9094
15 Facsimile: (213) 634-2485

16 WALTER L. HAINES (SBN 71075)
walter@uelglaw.com
17 UNITED EMPLOYEES LAW GROUP, PC
18 8605 Santa Monica Blvd., PMB 63354
West Hollywood, CA 90069
19 Telephone: (562) 256-1047
20 Facsimile: (562) 256-1006

21 Attorneys for Plaintiff(s),
22 KASSANDRA MENDIVIL, and all others similarly situated

23 CHANTAL RENEE MCCOY PAYTON (SBN 293215)
CPayton@PaytonEmploymentLaw.com
24 PAYTON EMPLOYMENT LAW PC
3807 W. Sierra Highway
25 Ste 206
Acton, CA 93510
26 Telephone: (661) 434-1144
27 Facsimile: (661) 434-1144

28 ///

1 MATTHEW L. MANN (SBN 276220)

2 mmann@mannrogal.com

3 JUSTIN R. ROGAL (SBN 273352)

4 jrogal@mannrogal.com

5 MANN ROGAL PC

6 3055 Wilshire Boulevard, Suite 630

7 Los Angeles, California 90010

8 Telephone: (310) 620-2314

9 Facsimile: (310) 620-2314

10 Attorneys for Plaintiff(s),

11 RICHARD BAUTISTA, and all others similarly situated

12 HAROUT A. MESSRELIAN (SBN 272020)

13 hm@messrelianlaw.com

14 MESSRELIAN LAW INC.

15 500 N Central Ave

16 Ste 840

17 Glendale, CA 91203

18 Telephone: (818) 484-6531

19 Facsimile: (818) 956-1983

20 Attorneys for Plaintiff(s),

21 MICHAEL NEVAREZ, and all others similarly situated

22 MARCUS JOSEPH BRADLEY (SBN 174156)

23 mbradley@bradleygrombacher.com

24 BRADLEY/GROMBACHER LLP

25 31365 Oak Crest Dr

26 Ste 240

27 Westlake Village, CA 91361-5600

28 Telephone: (805) 270-7100

Facsimile: (805) 270-7589

SAHAG MAJARIAN, II (SBN 146621)

sahagii@aol.com

MAJARIAN LAW GROUP

18250 Ventura Bl.

Tarzana, CA 91356

Telephone: (818) 609-0807

Facsimile: (818) 609-0892

Attorneys for Plaintiff(s),

JOE NUNEZ, and all others similarly situated

1 FRANK H. KIM (SBN 264609)
fkim@kim-legal.com

2 KIM LEGAL, APC
3 3435 Wilshire Blvd
4 Ste 2700
5 Los Angeles, CA 90010-2013
6 Telephone: (323) 482-3300
7 Facsimile: (866) 652-7819

8 HELEN KIM (SBN 260195)
9 helen@helenkimlaw.com
10 HELEN KIM LAW, APC
11 3435 Wilshire Blvd.
12 Suite 2700
13 Los Angeles, CA 90010
14 Telephone: (323) 487-9151
15 Facsimile: (866) 652-7819

16 Attorneys for Plaintiff(s),
17 HUNTER MEELEE, and all others similarly situated

18 **ATTORNEYS FOR DEFENDANT(S)**

19 TODD B. SCHERWIN (SBN 239848)
20 tscherwin@fisherphillips.com
21 CHRISTOPHER D. CHAPLIN (SBN 272337)
22 cchaplin@fisherphillips.com
23 ARIELLA M. KUPETZ (SBN 332736)
24 akupetz@fisherphillips.com
25 FISHER & PHILLIPS LLP
26 444 South Flower Street
27 Suite 150
28 Los Angeles CA 90071
Telephone: (213) 330-4500
Facsimile: (213) 330-4501

Attorneys for Defendant(s),
STRATEGIC GREEN PARTNERS LLC DOING BUSINESS AS AUTHENTIC 760, IGS
SOLUTIONS LLC, SHRYNE GROUP, INC., STIIIZY, LLC, and IRONWORKS
COLLECTIVE, INC., DOING BUSINESS AS BLAZE

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

2 PLEASE TAKE NOTICE that on February 9, 2024 at 9:00 a.m., or as soon thereafter as
3 the matter may be heard, in Department 14 of the Yolo County Superior Court, located at 1000
4 Main St, Woodland, CA 95695, Plaintiffs Jenica Cole, Shauna Adams, Kassandra Mendivil,
5 Richard Bautista, Michael Nevarez, Joe Nunez, and Hunter Meelee, and all others similarly
6 situated (collectively “Plaintiffs”) will and hereby do move this Court for an order: (1) granting
7 class certification of the Settlement Class solely for settlement purposes pursuant to California
8 Code of Civil Procedure section 382; (2) preliminarily approving the Class Action and PAGA
9 Settlement Agreement and Class Notice (the “Settlement”)¹ between Plaintiffs and Defendants
10 Strategic Green Partners LLC doing business as Authentic 760, IGS Solutions LLC, Shryne
11 Group, Inc., STIIIZY, LLC, and Ironworks Collective, Inc., doing business as Blaze (collectively
12 “Defendants”) (Plaintiffs and Defendants are collectively “the Parties”), (3) appointing David G.
13 Spivak of The Spivak Law Firm, Walter L. Haines of United Employees Law Group, PC, Chantal
14 Renee McCoy Payton, Matthew Mann and Justin Rogal of Mann Rogal, PC, Daniel F. Gaines
15 and Alex P. Katofsky of Gaines & Gaines, APLC, Joseph Tojarieh of Stonebrook Law, Harout
16 A. Messrelian of Messrelian Law Inc., Marcus Joseph Bradley of Bradley/Grombacher LLP,
17 Sahag Majariian, II of Majarian Law Group, Frank H. Kim of Kim Legal, APC, and Helen Kim
18 of Helen Kim Law, APC as Class Counsel; (5) appointing each Plaintiff as a Class Representative
19 (“Class Representative”); (6) approving the use of the proposed notice procedures and related
20 forms; (7) directing that notice be mailed to the proposed Settlement Class; and (8) scheduling a
21 hearing date for the motion for final approval of class action settlement and awards of attorneys’
22 fees and costs.

23 The “Settlement Class” or “Class Members” consists of all persons employed by
24 Defendants in California and classified as hourly, nonexempt who worked for Defendants during
25 the Class Period. “Class Period” means the period from January 28, 2017 to the date of the Court’s
26 order preliminarily approving this Settlement or Defendants’ election to provide a date certain

27 _____
28 ¹ The Settlement is attached as Exhibit 1 to the Declaration of David Spivak (“DS”), which is
submitted herewith under a separate cover.

1 when the 15% benchmark increase in Class Member Work Weeks is reached pursuant to the
2 Escalator Clause in Part 9 of the Settlement.

3 This Motion is made on the following grounds: (1) the Settlement Class meets all the
4 requirements for class certification for settlement purposes only under California Code of Civil
5 Procedure section 382; (2) Plaintiffs and their counsel are adequate to represent the Settlement
6 Class; (3) the Settlement reflects a fair, adequate, and reasonable compromise of all disputed
7 claims in view of Defendants' potential liability exposure as compared against the risks of
8 continued litigation; (4) the proposed notice procedures and related forms adequately apprise the
9 Class Members of their rights under the Settlement and fully comport with due process; and (5)
10 in view of the foregoing, notice should be disseminated to the Class Members and a hearing date
11 for motion for final approval of class action settlement, and awards of attorneys' fees and costs
12 should be set.

13 The Motion is based on this Notice of Motion and Motion, the attached Memorandum of
14 Points and Authorities, the Declarations of David G. Spivak of The Spivak Law Firm, Walter L.
15 Haines of United Employees Law Group, PC, Chantal Renee McCoy Payton, Matthew Mann and
16 Justin Rogal of Mann Rogal, PC, Daniel F. Gaines of Gaines & Gaines, APLC., Harout A.
17 Messrelian of Messrelian Law Inc., Marcus Joseph Bradley of Bradley/Grombacher LLP, Frank
18 H. Kim of Kim Legal, APC, and Helen Kim of Helen Kim Law, APC, all papers and pleadings
19 on file with the Court in this action, all matters judicially noticeable, and on such oral and
20 documentary evidence as may be presented in connection with the hearing on the Motion.

21 Respectfully submitted,

22
23 Dated: January 12, 2024

THE SPIVAK LAW FIRM

By: 

DAVID G. SPIVAK
MAYA CHEAITANI, Attorneys for
Plaintiff(s), KASSANDRA
MENDIVIL, and all others similarly
situated