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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SOLANO

HUY TRAN, et al.

Plaintiffs,
vs.

WISE AUTO GROUP, et al.
Defendants.

Case No. FCS055892

**NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT**

Date: March 20, 2026
Time: 9:00 a.m.
Dept. 3

TO THE COURT AND TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on March 20, 2026 at 9:00 a.m., or as soon thereafter as the matter may be heard before the Hon. Stephen Gizzi, in Department 3 of the above-entitled court, located at 580 Texas St., Fairfield, CA 94533, Plaintiffs will, and hereby do, move the Court, pursuant to California Code of Civil Procedure § 382, for entry of an order granting preliminary approval of the proposed Class and PAGA Action Settlement, including (1) preliminarily approving the class action settlement, (2) provisionally certifying the settlement Class, (3) approving the notice of class action settlement, (4) directing distribution of the notice of class action settlement to the Class, (5) appointing the proposed Settlement Administrator, (6) appointing the Class Representatives, (7) appointing Class Counsel, and (8) setting a hearing for final approval of the settlement.

This motion is based on this Notice of Motion, the Memorandum of Points and Authorities, the Declaration of Nicholas A. Carlin and attached exhibits filed concurrently herewith, the Declaration of Michael Sutherland for Apex Class Action, such evidence and argument of counsel as may be presented at the hearing, and such additional matters as the Court may consider at the hearing of this Motion.

Dated: October 30, 2025

PHILLIPS, ERLEWINE, GIVEN & CARLIN LLP

By: 

Nicholas A. Carlin

Brian S. Conlon

Robert Carroll III

Attorneys for Plaintiffs