

SROURIAN LAW FIRM, P.C.

Daniel Srourian (SBN 285678)

daniel@slfla.com

3435 Wilshire Blvd., Suite 1710

Los Angeles, California 90010

Telephone: (213) 474-3800

Facsimile: (213) 471-4160

COHELAN KHOURY & SINGER

Michael D. Singer (SBN 115301)

msinger@ckslaw.com

Marta Manus (SBN 260132)

mmanus@ckslaw.com

605 C Street, Suite 200

San Diego, CA 92101

Telephone: (619) 595-3001

Facsimile: (619) 595-3000

Attorneys for Plaintiffs Daniel Colmenares and Cathy Hernandez

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

DANIEL COLMENARES, an individual,
CATHY HERNANDEZ, and individual, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

FREE ENERGY SAVINGS COMPANY,
LLC, a California Limited Liability
Corporation; ALLAN RAGO, an individual;
KRISTINE VANNEMAN, an individual;
LEFLORIDA LESLIE, an individual and
DOES I through 100, inclusive;

Defendants.

Case No. CIVSB2028719

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Jessica Morgan
Department S26

REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS'
GENERAL ACT ("PAGA") SETTLEMENT**

Date: December 13, 2023

Time: 8:30 a.m.

Dept: S26

Judge: Hon. Jessica Morgan

Complaint filed: December 9, 2020

Trial date: Not Set

1 PLEASE TAKE NOTICE that on December 13, 2023 at 8:30 a.m. or as soon as the
2 matter may be heard in Department S-26 before the Honorable Jessica Morgan of the Superior
3 Court for the State of California, County of San Bernardino, located at 247 West Third Street,
4 San Bernardino, California 92415, Plaintiffs Daniel Colmenares and Cathy Hernandez
5 (“Plaintiffs”) will move the Court for an Order Granting Approval of a Private Attorneys
6 General Act (“PAGA”) Settlement. The Motion is made on the grounds that the proposed
7 Settlement is fair, adequate, and reasonable.

8 The Motion will be based on this Notice of Motion, the Memorandum of Points and
9 Authorities, the Declaration of Plaintiffs’ Counsel Daniel Srourian and Michael D. Singer, the
10 Declarations of Plaintiffs Daniel Colmenares and Cathy Hernandez, the Declaration of
11 Kimberly Sutherland on Behalf of ILYM Group, Inc., the Joint Stipulation of PAGA
12 Settlement and Release, (Exhibit 1 to the Singer Declaration), and all other papers and records
13 on file in this action, and on such oral and documentary evidence as may be presented at the
14 hearing on this Motion.

15 Respectfully submitted,

16 COHELAN KHOURY & SINGER
17 SROURIAN LAW FIRM, P.C.

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19 Dated: October 6, 2023

By: 

Michael D. Singer

Marta Manus

20 Attorneys for Plaintiffs Daniel Colmenares and
21 Cathy Hernandez, on behalf of themselves and
22 all others similarly situated
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