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7 Attorneys for Plaintiff
8 PEARL VARGAS DENAULT

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10 **SUPERIOR COURT OF CALIFORNIA**
11 **IN AND FOR THE COUNTY OF SAN BERNARDINO**
12

13 PEARL VARGAS DENAULT, as an
14 individual and on behalf of all others similarly
aggrieved,

15 Plaintiffs,
16 v.

17 LEWIS MANAGEMENT CORP., a Delaware
corporation; JOHN M. GOODMAN, an
18 individual; and DOES 1-50, inclusive,

19 Defendants.
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CASE NO. CIVSB2107487

Assigned for All Purposes to:
Hon. Christian Towns
Dept. S26

NOTICE OF MOTION AND MOTION FOR
APPROVAL OF SETTLEMENT UNDER
PRIVATE ATTORNEYS GENERAL ACT

[Filed Concurrently with Memorandum of
Points and Authorities; Declarations of Nikki
Trenner and Sean Hartranft; [Proposed]
Order]

Date: April 30, 2025
Time: 8:30 a.m.
Dept. S26

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

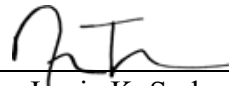
2 PLEASE TAKE NOTICE that on April 30, 2025, at 8:30 a.m., in Department S26 of the
3 San Bernardino County Superior Court, located at 247 West Third Street, San Bernardino,
4 California, Plaintiff Pearl Vargas Denault, on behalf of herself and the State of California by and
5 through the Labor Workforce & Development Agency, will and hereby does move the Court for
6 an order granting approval of the proposed settlement under the Private Attorneys General Act,
7 Labor Code sections 2698, *et seq.*, approving the payment of civil penalties to the State and the
8 Aggrieved Employees, approving Apex Class Action, LLC as the Settlement Administrator and
9 payment of its fees in the amount of \$8,000.00, and approving payment of Plaintiff's counsel's
10 attorney's fees in the amounts of \$400,000.00 and costs in the amount of \$23,819.43.

11 This motion is brought under Labor Code section 2699(1)(2), and on the grounds that the
12 settlement is fair, reasonable and adequate and meets all requirements for approval under PAGA,
13 and the requested service award and attorney's fees and costs are fair and reasonable under the
14 circumstances of the case.

15 This motion is based upon this Notice of Motion and Motion, the accompanying
16 memorandum of points and authorities, the accompanying declarations of Nikki Trenner and Sean
17 Hartranft, the entire Court file in this matter, and on such other argument and evidence as may be
18 presented at or before the hearing in this matter.

19
20 Dated: January 23, 20254

CROSNER LEGAL, PC

21
22 By: 

Jamie K. Serb

Nikki Trenner

Zachary M. Crosner

Attorneys for Plaintiff PEARL VARGAS
23 DENAULT
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