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

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF YOLO**
11 **(UNLIMITED JURISDICTION)**
12

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

18 *Plaintiff(s),*

19 vs.
20

21 STRATEGIC GREEN PARTNERS LLC
DOING BUSINESS AS AUTHENTIC 760, a
22 California limited liability company; IGS
SOLUTIONS LLC, a California limited liability
23 company; SHRYNE GROUP, INC., a California
corporation; STIIIZY, LLC, a California limited
24 liability company; IRONWORKS
COLLECTIVE, INC., DOING BUSINESS AS
25 BLAZE, a California corporation; TONY
HUANG, an individual; and DOES 1–50,
26 inclusive,
27

28 *Defendant(s).*

ELECTRONICALLY FILED
by Superior Court of CA,
County of Yolo,
on 1/12/2024 5:48 PM
By: N. Lorenzo, Deputy

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

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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: 

24
25 DAVID G. SPIVAK
26 MAYA CHEAITANI, Attorneys for
27 Plaintiff(s), KASSANDRA
28 MENDIVIL, and all others similarly
situated