

TOREY JOSEPH FAVAROTE (SBN: 198521)  
GLEASON & FAVAROTE LLP  
4014 Long Beach Blvd., Suite 300  
Long Beach, California 90807  
Telephone: (213) 452-0510  
Facsimile: (213) 452-0514  
[tfavarote@gleasonfavarote.com](mailto:tfavarote@gleasonfavarote.com)

Attorneys for Plaintiff Amara O'Neill  
and the Certified Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ORANGE**

AMARA O'NEILL, on behalf herself and all  
those similarly situated,

Plaintiff,

vs.

ROBINSON PHARMA INC., a California  
Corporation; TOMMY NGUYEN, an  
individual; and DOES 1-20, inclusive,

Defendants.

Case No. 30-2020-01176039-CU-OE-CJC

**PLAINTIFF'S NOTICE OF MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS AND PAGA ACTION  
SETTLEMENT; APPOINTMENT OF  
SETTLEMENT ADMINISTRATOR;  
APPROVAL OF CLASS NOTICE  
PACKET; REQUEST FOR A  
CONTINUED STAY ON ALL NON-  
SETTLEMENT ACTIVITY AND  
SETTING OF FINAL APPROVAL  
HEARING**

Date: April 11, 2024

Time: 2:00 p.m.

Judge: Hon. Melissa R. McCormick

Dept.: CX104

Reservation No. 74183465

Action Filed: December 23, 2020

Trial Date: None set

///

///

///

///

///

1 **TO THE CLERK OF THE COURT AND ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE** that on April 11, 2024, at 2:00 p.m., or as soon thereafter as the  
3 matter may be heard, in Department CX-104 of this Court, located at 751 W. Santa Ana Blvd.  
4 Santa Ana, CA 92701, before the Honorable Melissa R. McCormick, plaintiff Amara O'Neill  
5 ("Plaintiff") and the certified Class in this matter will and hereby do move the Court for  
6 preliminary approval of their class and PAGA action settlement; appointment of settlement  
7 administrator; approval of the settlement notice; continued stay of all non-settlement activities in  
8 this and related actions; and setting of the final approval hearing.

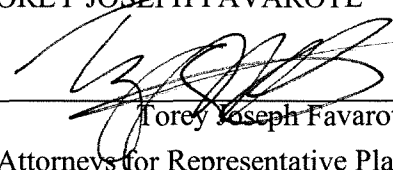
9 This motion is made on the grounds that the parties have reached a fair and reasonable  
10 settlement of Plaintiff and the certified Classes' claims that will deliver substantial value to the  
11 Class and the Labor and Workforce Development Agency (the "LWDA"), and the settlement is  
12 deserving of approval by this Court.

13 In connection with this motion, Plaintiff has given notice to the LWDA of the settlement  
14 and this motion pursuant to California Labor Code section 2699(1)(2).

15 This motion is based upon this notice; the accompanying Memorandum in Support of  
16 Motion for Preliminary Approval of Class and PAGA Action Settlement; Declaration of Amara  
17 O'Neill in Support; Declaration of Torey Joseph Favarote in Support; [Proposed] Order:  
18 (1) Preliminarily Approving the Settlement, (2) Appointing ILYM Group Inc. as Settlement  
19 Administrator, (3) Approving the Class Notice, (4) Setting a Hearing for Final Approval of the  
20 Settlement, and (5) Continuing the Stay on All Non-settlement Activity in This and Related  
21 Actions; the Court's record of this action; all matters of which the Court may take notice; and such  
22 oral and documentary evidence received by the Court at the hearing on the motion.

23 Dated: January 5, 2024

GLEASON & FAVAROTE LLP  
TOREY JOSEPH FAVAROTE

24  
25 By: 

Torey Joseph Favarote

Attorneys for Representative Plaintiff  
Amara O'Neill and the Certified Class

**PROOF OF SERVICE**

I, Thomas Steinhart, declare:

I am and was at the time of the service mentioned in this declaration, employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is Gleason & Favarote, LLP, 4014 Long Beach Blvd., Suite 300, Long Beach, CA 90807.

On January 5, 2024, I served a copy(ies) of the following document(s):

**PLAINTIFF'S NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS AND  
PAGA ACTION SETTLEMENT; APPOINTMENT OF SETTLEMENT  
ADMINISTRATOR; APPROVAL OF CLASS NOTICE PACKET; REQUEST FOR A  
CONTINUED STAY ON ALL NON-SETTLEMENT ACTIVITY AND SETTING OF  
FINAL APPROVAL HEARING**

on the parties to this action as follows:

| Attorney                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Party(ies) Served                                                        | Method of Service |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|-------------------|
| LAW OFFICE OF JARROD Y. NAKANO<br>Jarrod Y. Nakano<br>4 Park Plaza, Suite 125<br>Irvine, California 92614<br>Tel: (949) 544-2640<br><a href="mailto:jarrod@nakanolawfirm.com">jarrod@nakanolawfirm.com</a>                                                                                                                                                                                                                                                                       | Attorneys for Defendants<br>ROBINSON PHARMA,<br>INC. and TOMMY<br>NGUYEN | One Legal, LLC    |
| LAW OFFICES OF ETHAN H. NELSON<br>Ethan H. Nelson<br>4 Park Plaza, Suite 1025<br>Irvine, CA 92614<br>Tel: (949) 229-0961<br>Fax: (949) 861-7122<br><a href="mailto:EthanNelsonEsq@gmail.com">EthanNelsonEsq@gmail.com</a>                                                                                                                                                                                                                                                        | Attorneys for Defendants<br>ROBINSON PHARMA,<br>INC. and TOMMY<br>NGUYEN | One Legal, LLC    |
| Mark D. Kemple<br>Ryan C. Bykerk<br>Oscar E. Peralta<br>Andrea Carmona<br>GREENBERG TRAURIG, LLP<br>1840 Century Park East, Suite 1900<br>Los Angeles, CA 90067-2121<br>Tel: (310) 586-7700<br>Fax: (310) 586-7800<br><a href="mailto:kemplem@gtlaw.com">kemplem@gtlaw.com</a><br><a href="mailto:bykerkr@gtlaw.com">bykerkr@gtlaw.com</a><br><a href="mailto:oscar.peralta@gtlaw.com">oscar.peralta@gtlaw.com</a><br><a href="mailto:carmonaa@gtlaw.com">carmonaa@gtlaw.com</a> | Attorneys for Defendants<br>ROBINSON PHARMA,<br>INC. and TOMMY<br>NGUYEN | One Legal, LLC    |



[BY DESIGNATED ELECTRONIC FILING SERVICE] I hereby certify that the above-referenced document(s) were served electronically on the parties listed herein at their most recent known email address or email of record by submitting an electronic version of the document(s) to One Legal, LLC, through the user interface at [www.onelegal.com](http://www.onelegal.com).

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that this declaration was executed on January 5, 2024, at Long Beach, California.

\_\_\_\_\_  
Thomas Steinhart