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Representing Plaintiffs YOVANIK FLORES,
HUNG NGUYEN, and DIEGO BEDYOA
MORENO on behalf of themselves, all others
similarly situated, and on behalf of the general
public

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ALAMEDA**

YOVANIK FLORES, HUNG NGUYEN,
and DIEGO BEDOYA MORENO on
behalf of themselves, all others similarly
situated, and on behalf of the general
public,

Plaintiffs,

v.

HOME EXPRESS DELIVERY
SERVICE, LLC DBA TEMCO
LOGISTICS; and DOES 1-100,

Defendants.

Case No. RG21096517
(Related Case No. RG21100509)

**NOTICE OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION,
APPROVAL OF CLASS NOTICE, SETTING
OF FINAL APPROVAL HEARING DATE**

Date: June 13, 2023
Time: 9:15 a.m.
Judge: Hon. Brad Seligman
Dept.: 23
Reservation ID: 062533213396

Filed: April 13, 2021
Trial: None Set

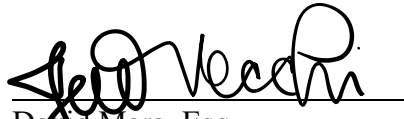
1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on June 13, 2023, at 9:15 a.m., or as soon thereafter as the
3 matter can be heard, in Department 23 of the Alameda County Superior Court, located at 1221
4 Oak Street, Oakland, California 94612, before the Honorable Brad Seligman, Plaintiffs Yovanik
5 Flores, Hung Nguyen, and Diego Bedoya Moreno will move the Court for Preliminary Approval
6 of Class and PAGA Action Settlement, Conditional Certification, Approval of Class Notice, and
7 Setting of Final Approval Hearing Date.

8 This motion will be based on this Notice, the Memorandum of Points and Authorities in
9 Support, the Declarations of David Mara, Esq., and Kane Moon, Esq., and any and all documents
10 filed in this matter, and any oral argument that may be presented at the hearing, and upon such
11 other matters as this Court may consider.

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14 Dated: May 19, 2023

MARA LAW FIRM, PC

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17 David Mara, Esq.
18 Jill Vecchi, Esq.
19 Representing Plaintiffs
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Case Name: YOVANIK FLORES and HUNG NGUYEN v. HOME EXPRESS
DELIVERY SERVICE, LLC DBA TEMCOLOGISTICS
Court: Superior Court of Alameda
Case Number: RG21096517

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I am employed in the County of: San Diego, State of California.

I am over the age of 18 and not a party to the within action; my business address is:
2650 Camino Del Rio N. Suite 302, San Diego, CA 92108

On, May 19, 2023 I served the foregoing document(s) described as:

**NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT, CONDITIONAL CERTIFICATION, APPROVAL
OF CLASS NOTICE, SETTING OF FINAL APPROVAL HEARING DATE**

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION
SETTLEMENT, CONDITIONAL CERTIFICATION, APPROVAL OF CLASS NOTICE,
SETTING OF FINAL APPROVAL HEARING DATE**

**DECLARATION OF DAVID MARA, ESQ., IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION, APPROVAL OF CLASS NOTICE, SETTING OF
FINAL APPROVAL HEARING DATE**

**DECLARATION OF KANE MOON IN SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION, APPROVAL OF CLASS NOTICE, SETTING OF
FINAL APPROVAL HEARING DATE**

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT, CONDITIONAL
CERTIFICATION, APPROVAL OF CLASS NOTICE, SETTING OF FINAL
APPROVAL HEARING DATE**

On interested parties in this action as follows:

Kamran Mirrafati, Esq. (233827)
SEYFARTH SHAW LLP
2029 Century Park East, Suite 3500
Los Angeles, California 90067
kmirrafati@seyfarth.com
(Via E-Mail & Personal Service)

Kane Moon, Esq. (249834)
Allen Feghali, Esq. (301080)
Charlotte Mikat-Stevens, Esq. (327047)
MOON & YANG, APC
1055 W. Seventh Street, Suite 1880
Los Angeles, California 90017
charlotte.mikat-stevens@moonyanglaw.com
kane.moon@moonyanglaw.com
allen.feghali@moonyanglaw.com
(Via E-Mail)

[XX] (BY E-MAIL) On May 19, 2023, I caused the documents to be sent to the persons at the electronic notification addresses of the parties named above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[XX] (BY PERSONAL SERVICE) On May 19, 2023, in addition to service methods listed above (if any), the above documents were delivered to the above recipients via personal delivery.

[XX] (DECLARATION) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Dated: May 19, 2023


Mathew Adame



Superior Court of Alameda County Public Portal

Make a Reservation

Flores VS Home Delivery Service, LLC

Case Number: RG21096517 Case Type: Unlimited Civil Category: Other Employment Complaint Case
Date Filed: 2021-04-13 Location: Rene C. Davidson Courthouse - Department 23

Reservation

Case Name: Flores VS Home Delivery Service, LLC	Case Number: RG21096517
Type: Motion re: (Preliminary Approval of Class Action Settlement)	Status: RESERVED
Filing Party: Yovanik Flores (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 23
Date/Time: 06/13/2023 9:15 AM	Number of Motions: 1
Reservation ID: 062533213396	Confirmation Code: CR-43JGFICA5KMC4TVJU

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	0.00	1	0.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: Visa
Account Number: XXXX0650	Authorization: 008780
Payment Date: 1969-12-31	

[Print Receipt](#)[+ Reserve Another Hearing](#)[View My Reservations](#)

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