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Attorneys for Plaintiff Sunny K. Tam, on behalf of himself
and other similarly-situated employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

SUNNY K. TAM, on behalf of himself and
other similarly-situated employees

Plaintiff,

v.

Q TECH CORPORATION, a California
Corporation; and DOES 1 Through 10,
inclusive,

Defendants.

Lead Case No. 21STCV18635

Related Case No. 21STCV19805

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Elihu M. Berle

Department SS6

**CLASS ACTION AND REPRESENTATIVE
ACTION**

**NOTICE OF MOTION AND MOTION FOR
ORDER GRANTING PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Information

Date: August 12, 2022

Time: 11:00 a.m.

Dept: SS-6

Judge: Hon. Elihu M. Berle

Complaint filed: May 17, 2021

Trial date: Not Set

1 PLEASE TAKE NOTICE, on August 12, 2022 at 11:00 a.m., or as soon as the matter may be
2 heard in Department 6 of the above captioned court located at 312 North Spring Street, Los Angeles,
3 California, 90012, Honorable Elihu M. Berle presiding, Plaintiff Sunny K. Tam, on behalf of himself
4 and the putative class, will move this Court for an Order:

5 1. Preliminarily approving the Class Action and Private Attorney Generals Act
6 Settlement as fair, adequate, and reasonable based upon the terms set forth in the Class Action and
7 PAGA Settlement Agreement and Release of Claims (“Settlement Agreement”), and payment by
8 Defendant Q-Tech Corporation of the \$650,000 Gross Settlement Amount;

9 2. Conditionally certifying the above-captioned case as a class action for settlement
10 purposes only;

11 3. Approving the Notice of Class Action Settlement be mailed together with a Change
12 of Address Form, via first class U.S. Mail to all members of the Settlement Class advising them of
13 the pendency of Class Action, the proposed Settlement, the manner and procedure for submitting
14 requests for exclusion, objections to the Settlement, of the automatic payment of their share of the
15 Settlement funds without the need to return a claim form, of the date set for the final approval hearing,
16 and of their right to appear at the time of the Final Approval hearing;

17 4. Appointing Isam Khoury, Michael Singer, Kristina De La Rosa, and Rosemary
18 Khoury of Cohelan Khoury & Singer, and Joseph Tojarieh of Stonebrook Law, as Class Counsel;

19 5. Appointing Plaintiff Sunny Tam as Class Representative;

20 6. Appointing the ILYM Group, Inc. as the Settlement Administrator;

21 7. Setting a hearing date to consider final approval of the Settlement.

22 This motion is based on this Notice of Motion, Points and Authorities in Support, Declarations
23 of Class Counsel Kristina De La Rosa and Joseph Tojarieh, Declaration of Sean Hartranft on behalf
24 of ILYM Group, Inc., the Settlement Agreement and its exhibits, and the [Proposed] Order Granting

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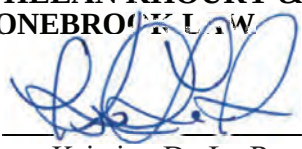
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1 Preliminary Approval of Class Action Settlement, the Court's files in this matter, and any other
2 documents or evidence which the Court may consider at the hearing of this motion.

3 Respectfully submitted,

4 **COHELAN KHOURY & SINGER**
5 **STONEBROOK LAW**

6 Dated: June 22, 2022

By:  _____

7 Kristina De La Rosa
8 Joseph Tojarieh
9 Counsel for Plaintiff Sunny Tam
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