

Armond M. Jackson, SBN 281547
ajackson@jacksonapc.com
Andrea M. Fernandez-Jackson, SBN 295924
afernandez@jacksonapc.com
JACKSON APC
2 Venture Parkway, Suite 400
Irvine, California 92618
Phone: (949) 281-6857
Fax: (949) 777-6218

Attorneys for Plaintiff Filiberto Ruiz,
individually, and on behalf of all other similarly situated employees

FARZAD RASTEGAR, State Bar No. 155555
farzad@rastegarlawgroup.com
DOUGLAS W. PERLMAN, State Bar No. 167203
douglas@rastegarlawgroup.com
RASTEGAR LAW GROUP, APC
22760 Hawthorne Blvd., Suite 200
Torrance, CA 90505
Tel.: (310) 961-9600
Fax: (310) 961-9094

Attorneys for Plaintiff Ericka Kraut
and all other similarly situated current
and former employees of Defendants

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

ROCIO ROSALES and ERICKA KRAUT, as
individuals and on behalf of others similarly
situated,

Plaintiffs,

vs.

DT EMPLOYER, LLC, a California limited
liability company; DT MANAGEMENT, LLC,
a California limited liability company;
DOUBLETREE EMPLOYER, LLC, a
California limited liability company; HILTON
EMPLOYER, INC., a California corporation;
HILTON HOTEL EMPLOYER, LLC, a

Case No.: CIVSB2132004

Assigned for all purposes to:
Hon. Christian Towns
Dept. S26

**NOTICE OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: August 18, 2025
Hearing Time: 8:30 a.m.
Department: S26

California limited liability company;
EMBASSY SUITES EMPLOYER, LLC, a
California limited liability company; CURIO
EMPLOYER, LLC, a California limited
liability company; HAMPTON INNS
EMPLOYER, LLC, a California limited
liability company; HLT CONRAD
DOMESTIC EMPLOYER, LLC, a California
limited liability company; HLT CONRAD
DOMESTIC, LLC, a California limited
liability company; CONRAD EMPLOYER,
LLC, a California limited liability company;
WALDORF-ASTORIA EMPLOYER, LLC, a
California limited liability company;
HOMEWOOD SUITES EMPLOYER, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,
Defendants.

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

2 **PLEASE TAKE NOTICE THAT** on August 18, 2025 at 8:30 a.m., or as soon thereafter
3 as the matter may be heard in Department S26 of the above-captioned court, located at 247 West
4 Third Street, San Bernardino, California 92415, the Honorable Christian Towns, presiding,
5 Plaintiffs Rocio Rosales and Ericka Kraut will, and hereby do, move this Court to, pursuant to
6 Code of Civil Procedure § 382 for an Order granting final approval of the Proposed Stipulation
7 of Class Action Settlement (“Settlement Agreement”) entered into between the Plaintiffs on
8 behalf of themselves and all others similarly situated, and Defendants (“Defendants”).

9 This Motion is based upon; (1) this Notice of Motion and Motion; (2) the Memorandum
10 of Points and Authorities in Support of the Motion for Final Approval of Class Action
11 Settlement; (3) the Declaration of Armond M. Jackson; (4) Declaration of Claims Administrator;
12 (5) Settlement Agreement; (6) Declaration of Plaintiff Rocio Rosales; (7) Declaration of Plaintiff
13 Ericka Kraut; (8) the [Proposed] Order Granting Final Approval of Class Action Settlement; (9)
14 the records, pleadings, and papers filed in this action; and (10) upon such other documentary and
15 oral evidence or argument as may be presented to the Court at or prior to the hearing of this
16 Motion.
17

18
19 Dated: July 25, 2025

20 By: /s/ Armond M. Jackson

21 Armond M. Jackson, Esq.
22 Andrea M. Fernandez-Jackson, Esq.
23 Anthony S. Filer, Jr., Esq.
JACKSON APC
Attorneys for Plaintiff Rocio Rosales and all other
similarly situated employees

24 Dated: July 25, 2025

25 By: /s/ Armond M. Jackson

26 Farzad Rastegar, Esq.
27 Douglas Perlman, Esq.
RASTEGARD LAW GROUP, APC
Attorneys for Plaintiff Ericka Kraut and all other
28 similarly situated employees