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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
California limited liability company;

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: March 12, 2025

Hearing Time: 8:30 a.m.

Department: S26

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

1 EMBASSY SUITES EMPLOYER, LLC, a
2 California limited liability company; CURIO
3 EMPLOYER, LLC, a California limited
4 liability company; HAMPTON INNS
5 EMPLOYER, LLC, a California limited
6 liability company; HLT CONRAD
7 DOMESTIC EMPLOYER, LLC, a California
8 limited liability company; HLT CONRAD
9 DOMESTIC, LLC, a California limited
10 liability company; CONRAD EMPLOYER,
11 LLC, a California limited liability company;
12 WALDORF-ASTORIA EMPLOYER, LLC, a
13 California limited liability company;
14 HOMEWOOD SUITES EMPLOYER, LLC, a
15 California limited liability company; and
16 DOES 1 through 100, inclusive,

17 Defendants.

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that on March 12, 2025 at 8:30 a.m., or as soon thereafter as counsel
4 may be heard, in Department S26 of the above-captioned court, located at 247 West Third Street, San
5 Bernardino, California 92415, the Honorable Christian Towns, presiding, Plaintiff Rocio Rosales an
6 Ericka Kraut will, and hereby does, move this Court to:

7 1. Preliminarily approve the settlement described in the Stipulation of Class Action
8 Settlement (attached as **Exhibit A** to the Declaration of Armond M. Jackson), which contains the
9 principal terms of the class action settlement between Plaintiffs Rocio Rosales and Ericka Kraut and
10 Defendants DT Employer LLC; DT Management LLC; Doubletree Employer LLC; Hilton Employer
11 Inc.; Hilton Hotel Employer LLC; Embassy Suites Employer LLC; Curio Employer LLC; Hampton Inns
12 Employer LLC; Hlt Conrad Domestic Employer LLC; Hlt Conrad Domestic LLC; Conrad Employer
13 LLC; Waldorf=Astoria Employer LLC; Homewood Suites Employer LLC. (collectively referred to as
14 “Parties”);

15 2. Conditionally certify the proposed Settlement Class;

16 3. Approve distribution of the proposed Notice of Class Action and Exclusion Form.

17 4. Appoint Plaintiffs Rocio Rosales and Ericka Kraut as the class representatives;

18 5. Appoint Jackson APC and Rastegar Law Group, APC as class counsels;

19 6. Appoint Phoenix Class Action Administrators as the settlement administrator; and

20 7. Set a hearing date for final approval of the settlement.

21 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
22 Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the
23 Declaration of Armond M. Jackson; (4) the Declaration of Rocio Rosales; (5) the Declaration of Ericka
24 Kraut; (6) the Notice of Class Action Settlement; (7) the [Proposed] Order Granting Preliminary
25 Approval of the Stipulation of Class Action Settlement; (8) the records, pleadings, and papers filed in this
26 action; and (9) such other documentary and oral evidence or argument as may be presented to the Court at
27 or prior to the hearing of this Motion.

28 **NOTICE OF PLAINTIFFS’ MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 Dated: November 29, 2024

By: /s/ Armond M. Jackson

Armond M. Jackson, Esq.

Andrea M. Fernandez-Jackson, Esq.

Anthony S. Filer, Jr., Esq.

JACKSON APC

Attorneys for Plaintiff Rocio Rosales and all other
similarly situated employees

5 Dated: November 29, 2024

By: /s/ Douglas Perlman

Farzad Rastegar, Esq.

Douglas Perlman, Esq.

RASTEGARD LAW GROUP, APC

Attorneys for Plaintiff Ericka Kraut and all other
similarly situated employees