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15 *Attorneys for Plaintiffs*
16 *and the Putative Class*

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
18 **COUNTY OF LOS ANGELES**

19 **SIMIN BORJKHANI**, individually and on
20 behalf of all others similarly situated,

21 Plaintiff,

22 vs.

23 **PARLUX FRAGRANCES, INC., PARLUX**
24 **FRAGRANCES, LLC, and RANDSTAD HR**
25 **SOLUTIONS OF DELAWARE, LLC d/b/a**
26 **RANDSTAD SOURCERIGHT**, jointly and
27 severally,

28 Defendants.

Case No.: 19STCV07372

**AMENDED PLAINTIFFS' NOTICE OF
MOTION AND MOTION TO FILE THE
FIRST AMENDED COMPLAINT; CLASS
CERTIFICATION; AND PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Judge: Daniel J. Buckley
Dept.: 01
Date: June 7, 2021
Time: 10:30 a.m.

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

2 **PLEASE TAKE NOTICE THAT** on June 7, 2021 at 10:30 a.m., or as soon thereafter as the
3 matter may be heard, in the Superior Court of the State of California, County of Los Angeles, Spring
4 Street Courthouse, 312 North Spring Street, Los Angeles, CA 90012, in Department 01, before Hon.
5 Daniel J. Buckley, Plaintiff Simin Borjkhani, together with proposed plaintiff Eva Lopez Acevedo,
6 will and hereby do move the Court for: leave to file the proposed First Amended Complaint; class
7 certification; appointment of Simin Borjkhani and Eva Lopez Acevedo as class representatives,
8 appointment of the undersigned counsel as class counsel, preliminary approval of class action
9 settlement; approval of class notice; and a date for the final approval hearing.

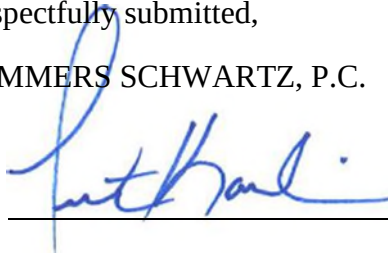
10 As further explained in the concurrently filed Memorandum of Points and Authorities, the
11 motion is made on the grounds that proposed class settlement is fair and reasonable, and should be
12 preliminarily approved. This Amended Motion addresses the concerns identified by the Court in its
13 April 20, 2021 Tentative Ruling. The proposed First Amended Complaint is filed herewith as a stand-
14 alone document.

15 The motion is based on this Notice, Memorandum of Points and Authorities, the Declaration
16 of Trenton R. Kashima, supporting exhibits, the oral argument of the parties if requested by the Court,
17 and the complete files and records of this action.

18 Respectfully submitted,

19 SOMMERS SCHWARTZ, P.C.

20
21 Dated: June 1, 2021

22 By: 

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27 *Attorneys for Plaintiffs*
28 *and the putative class*