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and NICOLE GREGORY
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF ORANGE**

12
13 WENDY SGONTZ, as an individual and
on behalf of all others similarly
14 aggrieved employees,

15 Plaintiffs,

16
17 vs.

18 CROSSMARK, INC., a Delaware
19 corporation; and DOES 1 to 50,
20 inclusive,

21 Defendants.
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Case No.: 30-2021-01204377-CU-OE-CXC

Assigned for All Purposes to:
Hon. Randall J. Sherman
Dept. CX105

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF SETTLEMENT UNDER
PRIVATE ATTORNEYS GENERAL ACT**

Date: August 9, 2024
Time: 10:00 a.m.
Dept.: CX-105

Reservation No.: 74284280

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

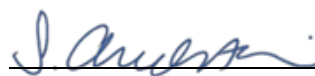
2 PLEASE TAKE NOTICE that on August 9, 2024, at 10:00 a.m., or as soon thereafter as
3 the matter may be heard, in Department CX-105 of the above-captioned Court, located at 751
4 West Santa Ana Blvd., Santa Ana, California, Plaintiffs Wendy Sgontz, Vicky Wright, Nicole
5 Gregory, and Jennifer Shellenbaum, on behalf of themselves and the State of California by and
6 through the Labor Workforce & Development Agency, will and hereby do move the Court for an
7 order granting approval of the proposed settlement under the Private Attorneys General Act, Labor
8 Code sections 2698, *et seq.*, approving the payment of civil penalties to the State and the
9 Aggrieved Employees, approving ILYM Group, Inc. as the Settlement Administrator and payment
10 of its fees in the amount of \$19,500.00, and approving payment of Plaintiff's counsel's attorney's
11 fees in the amount of \$389,961 and costs in the amount of \$25,000.00.

12 This motion is brought under Labor Code section 2699(1)(2), and on the grounds that the
13 settlement is fair, reasonable and adequate, advances the purposes underlying PAGA, and meets
14 all requirements for approval under PAGA. The requested service award and attorney's fees and
15 costs are fair and reasonable under the circumstances of the case.

16 This motion is based upon this Notice of Motion and Motion, the accompanying
17 memorandum of points and authorities, the accompanying declarations of Sepideh Ardestani, Kyle
18 Nordrehaug, Glenn A. Danas, Katelyn Leeviraphan, Wendy Sgontz, Vicky Wright, Nicole
19 Gregory, Jennifer Shellenbaum, and Lisa Mullins, the Parties' PAGA Settlement Agreement filed
20 herewith, the entire Court file in this matter, and on such other argument and evidence as may be
21 presented at or before the hearing in this matter.

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23 Dated: May 1, 2024

CROSNER LEGAL, P.C.

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25 

26 Sepideh Ardestani

27 Attorneys for Plaintiffs

28 WENDY SGONTZ, VICKY WRIGHT, NICOLE
GREGORY, and JENNIFER SHELLENBAUM