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8 Attorney for Plaintiff MARIO VILLALPANDO, on behalf of himself and all others similarly situated.

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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF RIVERSIDE**

13 MARIO VILLALPANDO, on behalf of himself
14 and all others similarly situated;

15 Plaintiffs,

16 v.

17 SOUTH CORONA AUTO SPA, LP, a California
18 Limited Partnership; and DOES 1 through 50
19 inclusive,

20 Defendants.

Case No.: CVRI2200998
Hon. Harold Hopp
Dept.: 1

21 **CLASS ACTION**

22 **NOTICE OF MOTION AND MOTION FOR
23 PRELIMINARY APPROVAL OF CLASS
24 ACTION AND PAGA SETTLEMENT**

25 [Filed concurrently with Memorandum of Points and
26 Authorities, Declaration of Anna R. Salusky,
27 Declaration of William E. Jemmott and [Proposed]
28 Order]

Date: August 26, 2025

Time: 8:30 a.m.

Dept. 1

Judge: Hon. Harold Hopp

RESERVATION NUMBER: 338832885951

Action filed: March 10, 2022

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on August 26, 2025 at 8:30 a.m., or as soon as thereafter as this
3 matter may be heard, in Department 10 of the Superior Court of California, County of Riverside,
4 located at 4050 Main Street, Riverside, CA 92501, Plaintiff Mario Villalpando ("Plaintiff"), by and
5 through his counsel of record, will and hereby does, move the Court for an order:

6 1. Preliminarily approving the Class Action and PAGA Settlement Agreement, attached as
7 Exhibit 1 to the Declaration of Anna R. Salusky filed concurrently herewith;

8 2. Provisionally certifying the proposed Class for settlement purposes only;

9 3. Granting preliminary approval of the Settlement reached in this matter;

10 4. Approving as to form the Notice of Class Action Settlement, which is attached as
11 Exhibit A to the Settlement Agreement, and ordering that the Notice of Class Action Settlement be
12 distributed to all Settlement Class Members;

13 5. Appointing Plaintiff Mario Villalpando as Class the Representative;

14 6. Appointing ILYM Group, Inc., as the Administrator;

15 7. Appointing Anna R. Salusky of Salusky Law Group as Class Counsel;

16 8. Determining whether, under California Rules of Professional Conduct, rule 1.5.1, and
17 California Rules of Court, rule 3.769, a valid fee sharing agreement exists between Salusky Law Group
18 and Arnulfo Gutierrez; and

19 9. Setting this matter for a hearing on the issues of final approval of the proposed
20 Settlement, approval of the Class Representative Service Payments, approval of the Class Counsel Fees
21 Payment, approval of the Class Counsel Expenses Payment, approval of the PAGA Penalties, and
22 approval of the Administrator Expenses Payment.

23 This motion is brought pursuant to rule 3.769 of the California Rules of Court and Labor Code
24 section 2699(1)(2) on the grounds that the proposed Settlement was reached as a result of informed
25 arm's-length negotiations and is within the range of reasonableness to be finally approved as fair,
26 adequate, and reasonable in all respects.

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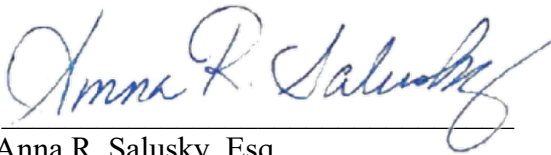
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1 This motion is based upon this Notice, the accompanying Memorandum of Points and
2 Authorities, the parties' Class Action and PAGA Settlement Agreement, the Declaration of William E.
3 Jemmott, the Declaration of Anna R. Salusky, the accompanying exhibits, which are filed and served
4 concurrently with this motion, all pleadings and papers filed in this action, and upon any such other
5 evidence or argument that may be presented to the Court at the time of the hearing.

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7 Dated: July 9, 2025

SALUSKY LAW GROUP, APC

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9 By:



10 Anna R. Salusky, Esq.

11 Attorney for Plaintiff MARIO VILLALPANDO
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