

MIRZAYAN LAW, APLC
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Attorneys for Plaintiffs
and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

DOMINGO MURCHISON, individually and on behalf of all current and former similarly situated employees in the State of California,	)	CASE NO.: 30-2021-01234789-CU-OE-CXC
Plaintiff,	)	ASSIGNED FOR ALL PURPOSES TO: HON.
	)	WILLIAM CLASTER; Dept.: CX-101
v.	)	Reservation No.: 74940680
	)	Date: October 2, 2026
MVP EVENT PRODUCTIONS, LLC, a	)	Time: 9:00 a.m.
California Limited Liability Company dba	)	Dept.: CX-101
MVP EVENT STAFFING; GREGORY	)	
FIELDING, an individual; LEGENDS	)	NOTICE OF PLAINTIFFS' RENEWED
HOSPITALITY, LLC, a Delaware Limited	)	MOTION FOR PRELIMINARY APPROVAL OF
Liability Company (previously designated by	)	CLASS ACTION AND PAGA SETTLEMENT
the fictitious name of "DOE 1"; and DOES 2	)	AND FOR PROVISIONAL CLASS
to 50, inclusive.	)	CERTIFICATION FOR SETTLEMENT
Defendant.	)	PURPOSES ONLY
	)	[Filed Concurrently with Memorandum of Points
	)	and Authorities; Declaration of Natalie Mirzayan;
	)	Request for Judicial Notice; Proposed Order]
	)	Complaint Filed: December 6, 2021

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

2 PLEASE TAKE NOTICE that on October 2, 2026, at 9:00 a.m., or as soon thereafter as this
3 matter may be heard in Department CX-101 of the Orange County Superior Court, Civil Complex
4 Center, located at 751 W. Santa Ana Blvd., Santa Ana, California 92701, Plaintiffs DOMINGO
5 MURCHISON and DAVINA BHULLAR (“Plaintiffs” or “Class Representatives”) will move, and
6 do move on behalf of themselves and all others similarly situated, for an Order:

7 1) Granting Preliminary Approval of the proposed Class Action Settlement in this Action;
8 2) Certification of the Class and Tip Class for Settlement purposes only, respectively defined as
9 follows:

10 All individuals who were employed by Legends Hospitality, LLC in the State of
11 California on a non-exempt basis at any time during August 21, 2021 to April 28, 2025.

12 All individuals who were employed by Legends Hospitality, LLC in the State of
13 California who was eligible to receive tips during August 21, 2021 through April 28,
2025.

14 3) Granting Approval of the proposed PAGA Settlement in this action on behalf of all
15 “Aggrieved Employees”, defined as follows:

16 All individuals who were employed by Legends Hospitality, LLC in the State of California
17 on a non-exempt basis at any time during September 18, 2021 to April 28, 2025.

18 4) Preliminary approval of a non-reversionary settlement payment by LEGENDS
19 HOSPITALITY, LLC (“Defendant” or “Legends”) in the amount of Eight Hundred Fifteen
20 Thousand Dollars and No Cents (\$815,000.00) to resolve the released claims and settlement costs,
21 inclusive of all Net Settlement Payments to the Class, Individual PAGA Payments, service payments
22 to Plaintiffs, Administration Expenses, Litigation Expenses, Class Counsel Fees, and the payment of
23 PAGA penalties to the LWDA. Legends will separately pay any required employer payroll taxes and
24 any additional amount expressly required under the Agreement.

25 5) Preliminary approval of Plaintiffs Davina Bhullar and Domingo Murchison as Class
26 Representatives;

27 6) Preliminary approval of Natalie Mirzayan of Mirzayan Law, APLC as Class Counsel;

28 7) Preliminary approval of the form and manner of the Notice to the Class;

1 8) Preliminary approval of the appointment of Apex Class Action Administration (“Apex”) as
2 the Administrator and preliminary approval of the costs of administration of the Settlement for an
3 amount estimated not to exceed \$32,500.00 to be paid from the Gross Settlement Amount
4 (“Administration Expenses”);

5 9) Preliminary approval of the Class Representatives Service Payment to each of the Class
6 Representatives, \$10,000.00 to Davina Bhullar and \$15,000.00 to Domingo Murchison, in the light
7 of his commitment as Class Representative since 2021 (in addition to any Individual Class Payment
8 and any Individual PAGA Payment the Class Representatives are entitled to receive as a Participating
9 Class Member) to be paid from the Gross Settlement Amount (“Class Representative Service
10 Payment”);

11 10) Preliminary approval of the application by Class Counsel to the Court seeking an award of
12 attorneys' fees not to exceed Three Hundred Twenty-Six Thousand Dollars (\$326,000.00), which is
13 40% of the Gross Settlement Amount, and Litigation Expenses not to exceed \$50,000.00 as supported
14 by invoices to be paid from the Gross Settlement Amount;

15 11) Preliminary approval of the payment of Eighty Thousand Dollars (\$80,000.00) from the
16 Gross Settlement Amount to fully settle and resolve all PAGA penalty claims. Sixty Thousand
17 Dollars (\$60,000.00), representing seventy-five percent (75%), to be paid to the Labor and
18 Workforce Development Agency (“LWDA”) of the State of California, and the remaining
19 \$20,000.00, which represents twenty-five percent (25%), to be distributed to Aggrieved Employees
20 on a pro-rata basis based on the total number of PAGA Pay Periods;

21 12) Establishing a schedule for the Class Notice to Class Members; and

22 13) Approving the filing of Plaintiffs’ Fourth Amended Complaint, which was stipulated to by
23 Plaintiffs and Defendant in the Agreement and is attached to the Declaration of Natalie Mirzayan, ¶
24 5, Exhibit “3”;

25 14) Setting a Final Approval hearing date.

26 This renewed motion will be based on this Notice of Motion, the concurrently filed
27 Memorandum of Points and Authorities, the Declaration of Natalie Mirzayan and exhibits attached
28 thereto, the Request for Judicial Notice and exhibits attached thereto, the Amended Joint Stipulation

1 Regarding Class Action and PAGA Settlement and Release and Addendum No. 1, the records and
2 pleadings on file in this Action, any argument of counsel, and such other matters as the Court may
3 consider.

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6 Dated: August 31, 2026

MIRZAYAN LAW, APLC



7 Natalie Mirzayan
8 Attorney for Plaintiffs and the Putative Class
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