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Attorneys for Plaintiff
DOMINGO MURCHISON

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,)

Plaintiff,

v.

MVP EVENT PRODUCTIONS, LLC, a)
California Limited Liability Company dba)
MVP EVENT STAFFING; GREGORY)
FIELDING, an individual; LEGENDS)
HOSPITALITY, LLC, a Delaware Limited)
Liability Company (previously designated by)
the fictitious name of "DOE 1"; and DOES 2)
to 50, inclusive.)

Defendant.)

CASE NO.: 30-2021-01234789-CU-OE-CXC

ASSIGNED FOR ALL PURPOSES TO:
WILLIAM D. CLASTER; Dept.: CX-101

Reservation Number: 74605108
Date: August 1, 2025
Time: 9:00 a.m.
Dept.: CX-101

NOTICE OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT AND FOR
PROVISIONAL CLASS CERTIFICATION
FOR SETTLEMENT PURPOSES ONLY

Complaint Filed: December 6, 2021

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

2 **PLEASE TAKE NOTICE** that on August 1, 2025, 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 of the State of
4 California, located at 751 W Santa Ana Blvd, Santa Ana, CA 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 are or previously were employed by Legends Hospitality, LLC in
11 the State of California on a non-exempt basis at any time during August 21, 2021
12 through April 28, 2025

13 All individuals who are or previously were employed by Legends Hospitality, LLC in
14 the State of California who was or is eligible to receive tips during December 6, 2017
15 through April 28, 2025

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

17 All individuals who are or previously were employed by Legends Hospitality, LLC in the
18 State of California on a non-exempt basis at any time during September 18, 2021 to April 28,
19 2025.

20 4) Preliminary approval of a non-revisionary settlement payment by Legends Hospitality, LLC
21 (“Defendant” or “Legends”) in the amount of Seven Hundred Seventy-Five Thousand Dollars and
22 No Cents (\$775,000.00) to resolve all claims, and costs relating to the Settlement, inclusive of all
23 Net Settlement Payments to the Class (including PAGA payments), the enhancement award to
24 Plaintiffs, costs to the Administrator, costs awarded to Class Counsel (Natalie Mirzayan of Mirzayan
25 Law, APLC), a portion of Class Counsel Fees (estimated to be \$310,000.00), and payment of PAGA
26 penalties to the LWDA. Legends will separately pay for any required employer payroll taxes.

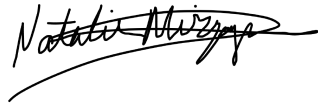
27 5) Preliminary approval of Plaintiffs, Davina Bhullar, and Domingo Murchison as Class
28 Representatives;

- 6) Preliminary approval of Natalie Mirzayan of Mirzayan Law, APLC as Class Counsel;
- 7) Preliminary approval of the form and manner of the Notice to the Class;
- 8) Preliminary approval of the appointment of Simpluris, Inc. (“Simpluris”) as the Administrator and preliminary approval of the costs of administration of the Settlement for an amount estimated not to exceed \$35,776.00 to be paid from the Common Settlement Fund (“Administration Expenses”);
- 9) Preliminary approval of the Class Representatives Service Payment to Class Representatives of not more than \$10,000.00 to Davina Bhullar and not more than \$15,000.00 to Domingo Murchison in the light of his commitment as Class Representative since 2021 (in addition to any Individual Class Payment and any Individual PAGA Payment the Class Representatives are entitled to receive as a Participating Class Member) to be paid from the Common Settlement Fund (“Class Representative Service Payment”);
- 10) Preliminary approval of the application by Class Counsel to the Court seeking an award of attorneys' fees 40% of the Common Settlement Fund not to exceed (\$310,000.00), and Litigation Expenses as supported by invoices to be paid from the Common Settlement Fund;
- 11) Preliminary approval of the payment of Forty Thousand Dollars (\$40,000.00) from the Common Settlement Fund to fully settle and resolve all PAGA penalty claims. Thirty Thousand Dollars (\$30,000.00), representing seventy-five percent (75%), to be paid to the Labor and Workforce Development Agency (“LWDA”) of the State of California, and the remaining \$10,000.00, which represents twenty-five percent (25%), to be distributed to Aggrieved Employees on a pro-rata basis based on the total number of PAGA Period Workweeks.
- 12) Establishing a schedule for the Class Notice to Class Members;
- 13) Approving the filing of Plaintiffs’ Fourth Amended Complaint, which was stipulated to by Plaintiffs and Defendant in the Agreement and is attached to the Declaration of Natalie Mirzayan as **Exhibit “2”**; and
- 14) Setting a Final Approval hearing date.

This **unopposed** motion will be based on this Notice of Motion, the Memorandum of Points and Authorities filed on May 23, 2025, ROA # 500, the Declaration of Natalie Mirzayan and exhibits

1 attached thereto filed on May 23, 2025, ROA # 502, argument of counsel, and upon such other
2 material contained in the file and pleadings of this action, *including but not limited to Supplemental*
3 *Declaration of counsel.*

4
5 Dated: July 9, 2025



NATALIE MIRZAYAN
MIRZAYAN LAW, APLC

Attorneys for Plaintiff
DOMINGO MURCHINSON