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Attorneys for Plaintiff Guadalupe Medina Lopez,
individually, and on behalf of all other similarly situated employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

GUADALUPE MEDINA LOPEZ, as an
individual and on behalf of other similarly
situated employees,

Plaintiff,
vs.

ATRIUM HOSPITALITY LP, a California
corporation, ATRIUM HOTELS
MANAGEMENT, LLC, a California
corporation, and DOES 1-50, inclusive,

Defendants.

Case No.: 30-2022-01245971-CU-OE-CXC

*Assigned for all purposes to the
Hon. Layne H. Melzer, Dept. CX102*

**NOTICE OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: July 3, 2025

Hearing Time: 2:00 p.m.

Department: CX102

Reservation ID: 74525349

**NOTICE OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

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

3 **PLEASE TAKE NOTICE** that on July 3, 2025 at 2:00 p.m., or as soon thereafter as counsel
4 may be heard, in Department CX102 of the above-captioned court, located at 751 W. Santa Ana Blvd.,
5 Santa Ana, California 92701, the Honorable Layne H. Melzer, presiding, Plaintiff Guadalupe Medina
6 Lopez will, and hereby does, move this Court to:

- 7 1. Preliminarily approve the settlement described in the Stipulation of Class Action
8 Settlement (attached as **Exhibit A** to the Declaration of Armond M. Jackson), which contains the
9 principal terms of the class action settlement between Plaintiff Guadalupe Medina Lopez and Defendant
10 Golden Hotels Limited Partnership dba Atrium Hotel (collectively referred to as “Parties”);
- 11 2. Conditionally certify the proposed Settlement Class;
- 12 3. Approve distribution of the proposed Notice of Class Action and Exclusion Form.
- 13 4. Appoint Plaintiff Guadalupe Medina Lopez as the class representative;
- 14 5. Appoint Jackson APC as class counsel;
- 15 6. Appoint ILYM Group, Inc. as the settlement administrator; and
- 16 7. Set a hearing date for final approval of the settlement.

17 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
18 Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the
19 Declaration of Armond M. Jackson; (4) the Declaration of Plaintiff; (5) the Notice of Class Action
20 Settlement; (6) the [Proposed] Order Granting Preliminary Approval of the Stipulation of Class Action
21 Settlement; (7) the records, pleadings, and papers filed in this action; and (8) such other documentary and
22 oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

23
24 Dated: April 2, 2025

By: /s/ Armond M. Jackson

Armond M. Jackson, Esq.

Andrea M. Fernandez-Jackson, Esq.

JACKSON APC

Attorneys for Plaintiff Guadalupe Medina Lopez and
all other similarly situated employees

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ACTION SETTLEMENT**