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Attorneys for Plaintiff

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

PEDRO MERAZ-VALENCIA, on behalf of the
Class, State of California, and Aggrieved
Employees,

Plaintiff,

v.

WESTLAKE ROYAL ROOFING, LLC,

Defendant.

Case No. 30-2022-01262267-CU-OE-CXC

Hon. David A. Hoffer

**NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: August 3, 2026

Time: 1:30 p.m.

Dept.: CX-103

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

2 **PLEASE TAKE NOTICE** that, on August 3, 2026, or as soon thereafter as the matter may
3 be heard in Department CX103 of the Superior Court of California, County of Orange, the Honorable
4 David Hoffer presiding, Plaintiff Pedro Meraz-Valencia (“Plaintiff”), will and hereby does move for
5 an Order:

- 6 1. Granting Final approval of the Settlement;¹
- 7 2. Finding that the Settlement is fair, adequate, and reasonable in all respects;
- 8 3. Finding that dissemination of the Class Notice was accomplished as directed and met
9 the requirements of due process;
- 10 4. Approving payment in the amount of \$87,500.00, from the Total Settlement Amount
11 for the PAGA claims, \$65,625.00 of which is payable to the California Labor and Workforce
12 Development Agency (“LWDA”), and \$21,875.00 of which will be distributed to the PAGA
13 Settlement Group members on a pro rata basis, as set forth in the Settlement.
- 14 5. Finally approving a Class Representative’s Service Award payment of \$10,000.00 to
15 named Plaintiff Pedro Meraz-Valencia from the Gross Settlement Amount for his efforts on behalf of
16 the Class, the Aggrieved Employees, and the State of California;
- 17 6. Finally approving an award of attorneys’ fees in the amount of \$612,500.00 to Class
18 Counsel from the Total Settlement Amount;
- 19 7. Finally approving an award of litigation costs in the amount of \$12,000.00 to Class
20 Counsel from the Total Settlement Amount;

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24 ¹ The “Settlement” refers to the Amended Class and Representative Action Settlement Agreement and
25 Release, fully executed as of August 29, 2025, and attached as Exhibit A to the Supplemental
26 Declaration of Philippe M.J. Gaudard in Support of Motion for Preliminary Approval of Class Action
27 and PAGA Settlement, filed August 29, 2025 (ROA No. 88) (“8/29/25 Gaudard Supp. Decl.”) and the
28 Amendment to Class and Representative Action Settlement Agreement and Release, fully executed as
of December 19, 2025, and attached as Exhibit A to the Supplemental Declaration of Philippe M.J.
Gaudard in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement, filed
December 22, 2025 (ROA No. 114) (“12/22/25 Gaudard Supp. Decl.”).

8. Finally approving payment of \$9,250.00 to the Settlement Administrator, Phoenix Class Action Administrative Solutions, from the Gross Settlement Amount for administering the Settlement;

9. Entering a final judgment consistent with the terms of the Settlement; and
Finally approving the implementation schedule contained in the Proposed Order and Judgment, filed concurrently herewith, and reiterated below:

Event	Deadline
Effective Date	The date on which the Court's order granting Final Approval of this Settlement becomes final. For purposes of this Agreement, such order becomes final as of the latest of the following occurrences: (i) sixty (60) days after the Court issues the Final Approval Order granting approval of this Settlement Agreement if no objections to the settlement are filed and no appeal is filed; or (ii) if an appeal is filed and is finally disposed of by ruling, dismissal, denial, or otherwise resulting in approval of the Settlement, the day after the last date for filing a request for further review of the Court of Appeal's decision passes and no further review is requested; or (iii) if an appeal is filed and there is a final disposition by ruling, dismissal, denial, or otherwise by the Court of Appeal resulting in approval of the Settlement, and further review of the Court of Appeal's decision is requested, the day after the request for review is denied with prejudice and/or no further review of the order can be requested; or (iv) if review is accepted, the day after the California Supreme Court affirms the judgment or order approving the Settlement.
Deadline for Phoenix to calculate the employer's share of taxes and provide Defendant with the total amount of employers' share of taxes	No later than seven (7) calendar days after the Effective Date, the Settlement Administrator shall send Defendant's Counsel electronic wiring instructions for paying the Total Settlement Amount (\$1,750,000) into the

	Qualified Settlement Fund. The Settlement Administrator will also inform Defendant of the amount to be sent to the Qualified Settlement Fund to pay for the employer's share of payroll taxes in accordance with this Agreement.
Deadline for Defendant to transfer the Total Settlement Amount into the Qualified Settlement Fund, and to deposit the calculated employer tax contributions	No later than ten (10) business days after the Effective Date.
Deadline for Phoenix to make payments to itself for Claims Administration Costs; Class Counsel for Class Counsel's attorneys' fee and costs award; individual settlement payments (comprising of any Individual Settlement Payments and any Individual PAGA Payments, combined into a single check); Class Representative's Service Award; and payments to the LWDA portion from the PAGA Payment	Within 10 calendar days after Defendant deposits the Total Settlement Amount into the Qualified Settlement Fund.
Deadline for Phoenix to send reminder postcards via mail and email to employees who have yet to cash their settlement checks	100 days before check-cashing deadline.
Check-cashing deadline	One hundred eighty (180) days after issuance.
Deadline for Settlement Administrator to provide the parties' counsel with a final report detailing its disbursement, by employee identification number only, all payments made under the Settlement	Within 10 calendar days after disbursing all funds.
The Administrator will prepare, and submit to Class Counsel and Defense Counsel, a signed declaration suitable for filing in Court attesting to its disbursement of all payments required under this Agreement. Class Counsel is responsible for filing the Settlement Administrator's declaration in Court	At least fifteen (15) calendar days before any deadline set by the Court for Class Counsel to file final accounting status report.

This Motion is based on this Notice of Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Esther L. Bylsma in Support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement (and exhibits thereto), the Declaration of Plaintiff Pedro Meraz-Valencia, the Declaration of Taylor Mitzner (and exhibits thereto), the accompanying Motion to Seal

1 Detailed Billing Records, the Declaration of Carilyn Cottrell (and exhibits thereto) all other documents
2 and records on file in this action, and on such further oral and documentary evidence as may be given
3 at the hearing, if any, on this Motion.
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5 DATED: July 10, 2026

Respectfully submitted,

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8 **SCHNEIDER WALLACE**
9 **COTTRELL KIM LLP**
Carolyn Hunt Cottrell
Esther L. Bylsma

10 *Attorneys for Plaintiff, on behalf of the State*
11 *of California and Aggrieved Employees*
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