

Justin F. Marquez (SBN 262417)
justin@wilshirelawfirm.com
Benjamin H. Haber (SBN 315664)
benjamin@wilshirelawfirm.com
Arrash T. Fattahi (SBN 333676)
afattahi@wilshirelawfirm.com
WILSHIRE LAW FIRM
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff Sager and the Putative Class

[Additional counsel on the following page]

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

GABRIEL SAGER and ELIZABETH
ADAMS, individually, on behalf of all others
similarly situated, and on behalf of the State
of California and other aggrieved persons,

Plaintiffs,

v.

SUMMIT FOOD SERVICE, LLC, a limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

CASE NO.: SCV-270486

Assigned to Hon. Christopher M. Honigsberg

CLASS & REPRESENTATIVE ACTION

**PLAINTIFFS' AMENDED NOTICE
OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Information:

Date: January 24, 2025
Time: 3:00 p.m.
Dept.: 18

BOKHOUR LAW GROUP, P.C.

Mehrdad Bokhour, CA Bar No. 285256

mehrdad@bokhourlaw.com

1901 Avenue of the Stars, Suite 450

Los Angeles, California 90067

Tel: (310) 975-1493; Fax: (310) 675-0861

FALAKASSA LAW, P.C.

Joshua S. Falakassa, CA Bar No. 295045

josh@falakassalaw.com

1901 Avenue of the Stars, Suite 450

Los Angeles, California 90067

Tel: (818) 456-6168; Fax: (888) 505-0868

Attorneys for Plaintiff Adams and the Putative Class

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 24, 2025, at 3:00 p.m., or as soon thereafter as the matter may be heard by the Honorable Christopher M. Honigsberg in Courtroom 18 of the Sonoma County Superior Court in the State of California, located at 3055 Cleveland Avenue, Santa Rosa, California 95403, Plaintiffs Gabriel Sager and Elizabeth Adams, individually and on behalf of all others similarly situated, will move the Court for entry of an Order granting preliminary approval of the Parties' Class Action and PAGA Settlement Agreement and Release ("Settlement Agreement" and/or "Settlement"), including:

1. Certifying the Class for purposes of settlement only;
2. Preliminarily appointing Plaintiffs Gabriel Sager and Elizabeth Adams as Class Representatives for purposes of settlement only;
3. Appointing Justin Marquez, Benjamin H. Haber, and Arrash T. Fattahi of Wilshire Law Firm, PLC, Mehrdad Bokhour of Bokhour Law Group, P.C. and Joshua Falakassa of Falakassa Law, P.C., collectively as Class Counsel for purposes of settlement only;
4. Preliminarily approving the Settlement as fair, adequate, and reasonable, based upon the terms set forth in the Settlement Agreement;
5. Directing distribution of the Notice Packet, including notice of the opportunity to exclude oneself from, or object to, the Settlement; and
6. Setting a date for a final fairness hearing to determine, following dissemination of the Notice Packet, whether to grant final approval of the Settlement.

This motion is based upon the accompanying Memorandum of Points and Authorities; the Declarations of Justin Marquez, Mehrdad Bokhour, and Joshua Falakassa in support thereof; the Settlement Agreement; the proposed Order; all other records, pleadings, and papers filed; and upon such other evidence or argument as may be presented to the Court at the hearing.

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2 Dated: October 22, 2024,

WILSHIRE LAW FIRM

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5 BY: /s/ Arrash T. Fattahi

6 Justin F. Marquez
7 Benjamin H. Haber
8 Arrash T. Fattahi
Attorneys for Plaintiff Sager and the Putative
Class

9 Dated: October 22, 2024,

**BOKHOUR LAW GROUP, P.C.
FALAKASSA LAW, P.C.**

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12 BY: /s/ Mehrdad Bokhour

13 Mehrdad Bokhour, Esq.
14 Joshua Falakassa, Esq.
15 Attorneys for Plaintiff Adams and the
16 Putative Class
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, California 90067.

On October 22, 2024, I served the following document(s) described as: **PLAINTIFFS' AMENDED NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties in this action:

Tracy Costantino, Esq.
tcostantino@littler.com
LITTLER MENDELSON, P.C.
633 W. 5th Street, 63rd Floor
Los Angeles, California 90071

Attorneys for Defendant Summit Food Service, LLC

Justin F. Marquez
justin@wilshirelawfirm.com
Benjamin H. Haber
benjamin@wilshirelawfirm.com
Arrash T. Fattahi
afattahi@wilshirelawfirm.com
WILSHIRE LAW FIRM
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010

Attorneys for Plaintiff Sager and the Putative Class

BY ELECTRONIC SERVICE: I transmitted the above-referenced document(s) via electronic service provider First Legal to the person(s) identified above at the email address(es) indicated and did not, within a reasonable time after transmission, receive any message or communication indicating that delivery failed or that any other error had occurred which would delay or caused failure in transmission and delivery of the document and/or any attachments thereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 22, 2024, in Los Angeles, California.

/s/ Cynthia Garcia
Cynthia Garcia