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9 **SUPERIOR COURT OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF LOS ANGELES**

11 CHRISTIAN SOLIS, RENE A. SORTO,
12 AKILA DAVENPORT, PEARL
PALACIOS, CHRISTIAN FERNANDEZ,
13 and RYAN CROWE, as individuals and on
behalf of all others similarly situated,

14 .
Plaintiffs,

15 v.

16 WORLDWIDE FLIGHT SERVICES,
17 INC., a Delaware corporation; and DOES
1-100, inclusive,

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19 Defendants.
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Case No.: 22STCV04332

Assigned for All Purposes to:
Hon. Timothy Patrick Dillon
Dept. SSC-15

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT, AND
REQUEST FOR ATTORNEY'S FEES AND
COSTS**

Date: September 10, 2026
Time: 10:00 a.m.
Dept.: SSC-15

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26 Attorneys for Plaintiff RYAN CROWE
27
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1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT on September 10, 2026, at 10:00 a.m., or as soon
3 thereafter as the matter may be heard, in Department SSC-15 of the above-entitled Court, located
4 at 312 N. Spring St., Los Angeles, California, Plaintiffs Christian Solis, Akila Davenport, Pearl
5 Palacios, Ryan Crowe, Christian Fernandez, and Rene A. Sorto, on behalf of themselves and the
6 conditionally certified settlement class, will and hereby do move the Court for an order granting
7 final approval of the proposed class action settlement, approving the payment of civil penalties,
8 approving the class representative service payment provided for the class action settlement, and
9 approving payment of the Settlement Administrator's fees and expenses. Plaintiffs also will and
10 hereby does move the Court for an order granting an award of attorney's fees in the amount of
11 \$1,705,000 (1/3 of the gross settlement amount) and costs in the amount of \$44,019.44, as provided
12 in the proposed class action settlement.

13 This motion is brought under California Rule of Court 3.769, on the grounds that the
14 settlement is fair, reasonable and adequate and in the best interests of the class, and meets all
15 requirements for class certification. The requested class representative service payment is fair and
16 reasonable under the circumstances of the case. The requested attorney's fees and costs are fair
17 and reasonable under the circumstances of the case.

18 This motion will be based on this Notice of Motion and Motion, the accompanying
19 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying
20 Declarations of Nikki Trenner, Eric J. Naessig, Zorik Mooradian, Michael Nourmand, and Kevin
21 Lee, the Court's entire file herein, and on such further evidence and argument as may be presented
22 at the hearing.

23 Dated: August 18, 2026

CROSNER LEGAL, P.C.

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25 Nikki Trenner
26 Zachary Crosner
27 Jamie Serb
28 Attorneys for Plaintiffs