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Attorneys for Plaintiff Tami Marie Boyer, individually,  
and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA CLARA**

TAMI MARIE BOYER, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

SERRANO ELECTRIC INC.; and DOES 1  
through 20, inclusive,

Defendants.

Case No. 22CV399734

*Assigned for All Purposes to:  
Judge Sunil R. Kulkarni; Dept. 1*

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

Date: January 11, 2024

Time: 1:30 p.m.

Dept: 1

**TO ALL INTERESTED PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that on January 11, 2024 at 1:30 p.m., or as soon thereafter as the matter may be heard in Department 1 of the above-entitled Court located at 191 North First Street, San Jose, California 95113, Plaintiff Tami Marie Boyer ("Plaintiff") will and hereby does move this Court for an Order:

1. Granting preliminary approval of the proposed Class Action and PAGA Settlement Agreement and Class Notice ("Settlement Agreement" or "Agreement");
2. Conditionally certifying the proposed Class for settlement purposes only;
3. Appointing Plaintiff Tami Marie Boyer as the Class Representative;
4. Appointing Aegis Law Firm, PC as Class Counsel;
5. Appointing Rust Consulting, Inc. as the Settlement Administrator and authorizing Rust Consulting, Inc. to send notice of the Settlement to the Class Members; and
6. Setting a final approval hearing date.

Pursuant to California Rules of Court 3.769(d) and (e), the Motion is made on the grounds that the proposed Settlement Agreement satisfies all criteria for preliminary approval under California law and falls well within the range of reasonableness; the Agreement was reached through informed, arms-length bargaining between experienced attorneys, and Plaintiff and Class Counsel will fairly and adequately represent the Class Members.

The Motion is based on this Notice of Motion, Plaintiff's Motion for Preliminary Approval of Class and Representative PAGA Action Settlement, the Declaration of Jamie M. Loos, the Declaration of Tami Marie Boyer, and on all records and documents on file, together with such oral and documentary evidence that may be presented at the hearing on this matter.

Dated: December 12, 2023

**AEGIS LAW FIRM, PC**

By:   
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Jamie M. Loos  
Attorneys for Plaintiff