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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

LUIS ALBERTO BONILLA and JORGE RODRIGUEZ, an individual on behalf of himself and all others similarly situated, Plaintiff, vs. ARCOS MANAGEMENT, INC., a California stock corporation; and DOES 1 through 50, inclusive, Defendants.	Case No.: 37-2024-00024322-CU-OE-CTL CLASS ACTION Assigned for All Purposes To: Hon. Matthew C. Braner Dept.: C-60 **NOTICE OF MOTION AND PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AGREEMENT** Date: March 26, 2027 Time: 9:30 a.m. Location: Department C-60

TO THE COURT, DEFENDANTS, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 26, 2027, at 9:00 a.m. in Department C-60 of the San Diego Superior Court located at 330 W Broadway, San Diego, CA 92101, Luis Alberto Bonilla and Jorge Rodriguez ("Plaintiffs"), on behalf of themselves and other similarly situated employees of Defendant Arcos Management, Inc.. ("Defendant") (collectively, "the Parties"), will and hereby does move this Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order as proposed:

1. Preliminarily approving the proposed class-wide settlement of this action as set forth in the Parties' Class Action and PAGA Settlement Agreement ("Settlement Agreement"), which is attached as Exhibit 1 to the Declaration of Enoch J. Kim ("Kim Decl."), filed concurrently herewith;

2. Approving the form and method for providing notice to the Class Members and approving the form and content of the Parties' proposed Notice of Class Action and PAGA Settlement ("Class Notice") for sending to the Class Members (provided as Exhibit A to the Settlement Agreement;

3. Approving for mailing the Class Notice packet, consisting of the Court approved Class Notice and directing that it be sent to the Class Members;

4. Appointing Plaintiffs Alberto Luis Bonilla and Jorge Rodriguez as class representatives for settlement purposes only;

5. Appointing Natalie Haritoonian, Enoch J. Kim, Matthew Carraher, and Jonas Agle of D.Law, Inc. and Nicholas Ferraro of Ferraro Vega as Class Counsel for settlement purposes only;

6. Scheduling a final approval hearing date to consider the Parties' request for final approval of the proposed Settlement and Plaintiff's application for a Class Counsel Fees Payment and Class Counsel Litigation Expenses Payment, consisting of attorneys' fees to Class Counsel and litigation costs incurred in pursuing this Action;

7. Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed settlement's allocation of funds to claims made under Labor Code §§ 2698, *et seq*., the

Private Attorneys General Act of 2004 ("PAGA").

This Motion is made on the grounds that after good-faith, arm's length negotiations, the Parties have agreed upon a Settlement which is fair, reasonable, and adequate and in the best interests of the Class and all Parties. Defendant does not oppose the Motion. This Notice of Motion and Motion is also based on the fact that this Settlement was the product of informed, non-collusive negotiations by the Parties, who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44. The proposed Settlement meets the legal standard for preliminary approval and is in the best interests of the Class; the proposed form of Class Notice explains the Settlement terms in a clear and straightforward manner; the proposed procedures for notice provide the best practical notice to the Class; and Class Members will have an opportunity to participate in and/or object to the Settlement and/or opt-out of the Settlement.

This Motion is based upon this Notice of Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Enoch J. Kim, the Declaration of Plaintiff Luis Bonilla, the Declaration of Plaintiff Jorge Rodriguez, the Declaration of Conor Gomez, the Declaration of Julie Green, the [Proposed] Order, the Parties' Settlement Agreement and Class Notice, the Court's record of this action, all matters of which the Court may take notice, and upon such oral or documentary evidence as the Court may receive at or before the hearing on this unopposed Motion.

DATED: November 5, 2026

D.LAW, INC.

By _____
Enoch J. Kim
Matthew Carraher
Attorneys for Plaintiff Luis Alberto Bonilla and the Settlement Class