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Attorneys for Plaintiffs ALDERIECH VILLAMOR and RONY ALEXIS BONILLA, on behalf of themselves and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ALDERIECH VILLAMOR and RONY ALEXIS BONILLA, on behalf of themselves and all others similarly situated, and the general public, Plaintiffs, vs. ABERCROMBIE & FITCH STORES, INC. an Ohio corporation; ABERCROMBIE & FITCH MANAGEMENT CO. a Delaware corporation; ABERCROMBIE & FITCH CO. a business entity of unknown form; and DOES 1 through 50, inclusive, Defendants.	Case No.: 25STCV03948 CLASS ACTION Assigned for All Purposes To: Hon. William F. Highberger Department: 10 **PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR AN ORDER (1) PRELIMINARILY APPROVING THE CLASS ACTION SETTLEMENT; (2) APPROVING NOTICE OF SETTLEMENT; (3) SETTING HEARING FOR FINAL APPROVAL** Hearing Date: March 8, 2027 Time: 10:00 a.m. Department: 10

TO THE COURT AND DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 8, 2027, at 10:00 a.m., or as soon thereafter as this matter may be heard, at Department 10, located at 312 North Spring Street, Los Angeles, California 90012, Plaintiffs Aldriech Villamor And Rony Alexis Bonilla ("Plaintiffs"), on behalf of themselves and all persons similarly situated, will and hereby moves this Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order:

(1) Preliminarily approving the class action settlement reached between Plaintiffs and Defendants Abercrombie & Fitch Stores, Inc., Abercrombie & Fitch Management Co., and Abercrombie & Fitch Co. ("Defendants"), including granting preliminary approval of the following class: all current and former non-exempt, hourly-paid employees who worked for Defendant Abercrombie & Fitch Stores, Inc. in the State of California at any time during the Class Period (July 9, 2021, through date the Court enters an order granting Preliminary Approval of the Settlement Agreement).

(2) Approving the form of the Class Notice and procedure for notice to the class; and

(3) Setting the final approval hearing.

Pursuant to California Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed settlement's allocation of funds to claims made under the Labor Code Private Attorneys General Act of 2004 ("PAGA").

Pursuant to the proposed Class Action and PAGA Settlement Agreement ("Settlement" or "Settlement Agreement"), filed concurrently herewith, Defendants do not oppose the preliminary approval of the class action settlement.

Under the terms of the Settlement, the parties have agreed that all claims brought on behalf of the Class Members shall be fully and finally resolved for the total sum of Three Million Three Hundred Twenty-Three Thousand Dollars and Zero cents ($3,323,000.00) ("Gross Settlement Amount") to be paid on a non-reversionary basis. The amount remaining of the Gross Settlement Amount after the following deductions have been made ("Net Settlement Amount") shall be available for distribution to Class Members who do not opt out of the settlement:

- not more than One Million One Hundred Seven Thousand Six Hundred and Sixty-

Six dollars and Sixty-Seven cents ($1,107,666.67) to Class Counsel for attorneys' fees, and not more than Twenty-Five Thousand dollars and Zero cents ($25,000.00) to Class Counsel for litigation costs;

- not more than Seventy-Five Thousand dollars and Zero cents ($75,000.00) for the Settlement Administration Costs;
- not more than Ten Thousand dollars and Zero cents ($10,000.00) to each of the Plaintiffs Aldriech Villamor and Rony Alexis Bonilla for a Class Representative Enhancement Payment (Totaling $20,000.00); and
- Two Hundred Thousand dollars and Zero cents ($200,000.00) for civil penalties under the PAGA, where 65% ($130,000.00) will be paid to the LWDA and 35% ($70,000.00) will be included in the Net Settlement Amount and distributed to Settlement Class Members.

This Notice of Motion and Motion is based on the fact that this is a fair and reasonable settlement that benefits the class and 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.*, 48 Cal. App. 4th 1794, 1802 (1996); 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 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 Notice of Motion and Motion is based on this Notice, and the exhibits thereto (including the Notice to Class Members), the accompanying Memorandum of Points and Authorities, the Declarations of Enoch J. Kim, Aldriech Villamor, Rony Alexis Bonilla, Jodey Lawrence, Jarrett Gorlick, as well as the pleadings, records and files in the case, and such other further oral and documentary evidence which may be submitted at or before the hearing on this Motion.

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Dated: November 4, 2026

Respectfully submitted,

D.LAW, INC.

By _____

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Svetlana Hovhannisyan, Esq.

Attorneys for Plaintiffs