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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Bryan Gonzalez, an individual, in his
individual and representative capacity,

Plaintiff,

v.

Los Angeles Breakers FC, and DOES
1-10, inclusive,
Defendants.

Case No.: 22STCV22742

**NOTICE OF MOTION AND MOTION
FOR AN ORDER:**

- (1) PRELIMINARILY APPROVING
SECOND REVISED CLASS ACTION
SETTLEMENT;**
- (2) CONDITIONALLY CERTIFYING THE
SETTLEMENT CLASS;**
- (3) DIRECTING DISTRIBUTION OF
NOTICE OF SETTLEMENT; AND**
- (4) SETTING A HEARING FOR FINAL
APPROVAL OF THE SETTLEMENT**

Hearing Date: June 11, 2025
Time: 9:00 AM
Dept.: SS17
Judge: Hon. Laura A. Seigle

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on June 11, 2025 at 9:00 a.m., or as soon as the
3 matter may be heard before the Honorable Laura A. Seigle, in Department SS17 of this
4 Court, located at 312 N Spring St, Los Angeles, CA 90012, Plaintiff and putative Class
5 Representative Bryan Gonzalez (“Plaintiff”) will and hereby does move this Court for
6 entry of the Proposed Order filed concurrently herewith:

- 7 1. Preliminarily approving the Second Revised Settlement of this matter;
8 2. Conditionally certifying a class for the purposes of settlement;
9 3. Appointing Bryan Gonzalez as Class Representative;
10 4. Appointing Allen Graves as Class Counsel;
11 5. Approving and directing distribution to the Class of the Notice of Settlement
12 filed herewith;
13 6. Appointing Simpluris as Settlement Administrator;
14 7. Establishing the procedure and schedule for the Class Notice process; and
15 8. Setting a hearing for final approval of the settlement.

16 This motion is based upon this Notice of Motion and Motion, the Memorandum of
17 Points and Authorities in Support of Preliminary Approval, the Declaration of Allen
18 Graves, the Declaration of Bryan Gonzalez, the Declaration of Patrick Ivie, the [Proposed]
19 Order, the records, pleadings, and papers filed in this action; and such other documentary
20 and oral evidence or as may be presented to the Court at the hearing of this motion.

21
22 DATED: May 12, 2025

THE GRAVES FIRM

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24 By: 

JACQUELINE TREU

Attorney for Plaintiff

Bryan Gonzalez

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss:
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18, and not a party to the within action. My business address is 122 N. Baldwin Ave., Main Floor, Sierra Madre, CA 91024.

On May 12, 2025, I served the following document(s) described as:

NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL

on the interested parties by transmitting a true and correct copy thereof addressed as follows:

Michael J. O'Connor
Sarkis A. Atoyan
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Attorneys for Defendant
Los Angeles Breakers FC

☒ **VIA ELECTRONIC SERVICE:**

Pursuant to the Court's Order, I personally sent such document(s) via Case Anywhere to all parties registered in this Action.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and was executed on May 12, 2025 at Sierra Madre, California.

Abraham Polayes

Type or Print Name

Signature

