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Attorneys for Plaintiffs Jacob McKeehan and
Robert Marslek, individually,
and on behalf of all others similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JACOB McKEEHAN and ROBERT
MARSLEK, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

JETSUITEX, INC.; SUPERIOR AIR
CHARTER, LLC; DELUX PUBLIC
CHARTER, LLC; and DOES 1 through 20,
inclusive,

Defendants.

Case No. 22STCV24435

Assigned for all purposes to:
Hon. Elihu M. Berle
Dept. 6

**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND PAGA SETTLEMENT**

Date: September 19, 2025
Time: 11:00 a.m.
Dept: 6

1 **TO THE COURT, ALL INTERESTED PARTIES, AND THEIR RESPECTIVE**
2 **ATTORNEYS OF RECORD:**

3 PLEASE TAKE NOTICE that on September 19, 2025 at 11:00 a.m., or as soon thereafter
4 as the matter may be heard in Department 6 of the above-entitled Court located at 312 North
5 Spring Street, Los Angeles, CA 90012, Plaintiffs Jacob McKeehan and Robert Marslek
6 (“Plaintiffs”) will and hereby do move this Court for an Order:

- 7 1. Granting preliminary approval of the proposed Class Action and Private Attorneys
8 General Act Settlement and Release Agreement (“Settlement Agreement” or
9 “Agreement”);
- 10 2. Conditionally certifying the proposed Class for settlement purposes only;
- 11 3. Appointing Plaintiffs Jacob McKeehan and Robert Marslek as the Class
12 Representatives for settlement purposes only;
- 13 4. Appointing Kashif Haque, Samuel Wong, Jessica Campbell, and Kristy Connolly of
14 Aegis Law Firm; Larry Lee of Diversity Law Group; William Marder of Polaris Law
15 Group; and Dennis Hyun of Hyun Legal, APC as Class Counsel for settlement
16 purposes only;
- 17 5. Approving the form and content of the Notice of Proposed Settlement and Final
18 Settlement Approval Hearing (the “Class Notice”);
- 19 6. Appointing ILYM Group, Inc. as the Settlement Administrator and authorizing
20 ILYM Group, Inc. to send notice of the Settlement to the Class Members; and
- 21 7. Setting a final approval hearing date.

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

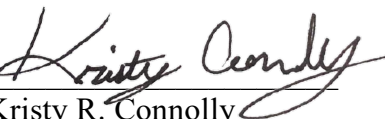
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1 The Motion is based on this Notice of Motion, Plaintiff's Memorandum of Points and
2 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement, the
3 Declaration of Kristy R. Connolly, the Declaration of Larry W. Lee, the Declaration of William
4 L. Marder, the Declaration of Simon L. Yang, the Declaration of Dennis Hyun, the Declaration
5 of Jacob McKeehan, the Declaration of Robert Marslek, the Declaration of Lisa Mullins, and on
6 all records and documents on file, together with such oral and documentary evidence that may
7 be presented at the hearing on this matter.

8
9 Dated: July 31, 2025

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10
11 By: 
12 Kristy R. Connolly
Attorneys for Plaintiffs