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and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

PATRICIA CRUZ, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

WELLNEST EMOTIONAL HEALTH &
WELLNESS; and DOES 1 through 20,
inclusive,

Defendants.

Case No. 22STCV23671

Assigned for All Purposes to:

Judge Timothy Dillon

Dept. 15

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

Date: July 1, 2025

Time: 10:00 a.m.

Dept: 15

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

3 PLEASE TAKE NOTICE that on July 1, 2025 at 10:00 a.m., or as soon thereafter as the matter
4 may be heard in Department 15 of the above-entitled Court located at 312 North Spring Street, Los
5 Angeles, CA 90012, Plaintiff Patricia Cruz ("Plaintiff") will and hereby does move this Court for an
6 Order:

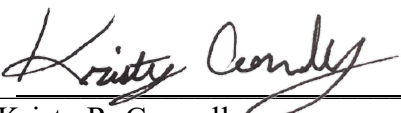
- 7 1. Granting preliminary approval of the proposed CLASS ACTION AND PAGA
8 SETTLEMENT AGREEMENT AND CLASS NOTICE ("Settlement Agreement");
- 9 2. Conditionally certifying the proposed Class for settlement purposes only;
- 10 3. Appointing Plaintiff Patricia Cruz as the Class Representative;
- 11 4. Appointing Aegis Law Firm, PC as Class Counsel;
- 12 5. Appointing ILYM Group, Inc. as the Settlement Administrator and authorizing ILYM
13 Group, Inc. to send notice of the Settlement Agreement to the Class Members; and
- 14 6. Setting a final approval hearing date.

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

20 The Motion is based on this Notice of Motion, Plaintiff's Memorandum of Points and
21 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement, the Declaration
22 of Kristy R. Connolly, the Declaration of Patricia Cruz, the Declaration of Lisa Mullins, and on all
23 records and documents on file, together with such oral and documentary evidence that may be presented
24 at the hearing on this matter.

25 Dated: June 2, 2025

AEGIS LAW FIRM, PC

26
27 By: 
28 Kristy R. Connolly
Attorneys for Plaintiff