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an individual on behalf of himself and others similarly situated

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

RICARDO ANTONIO PEREZ FLORES,
individuals and on behalf of himself and
others similarly situated,

Plaintiff,

v.

L.A. HARDWOOD FLOORING, INC., a
California Corporation; and DOES 1 through
50, inclusive,

Defendant.

Case No.: 22STCV26518

CLASS ACTION

Assigned for All Purposes To:
Hon. David S. Cunningham III
Dept.: 11 – Spring Street Courthouse

**AMENDED NOTICE OF MOTION OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF THE
PARTIES' CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT**

Date: June 10, 2025
Time: 10:30 a.m.
Location: Division 11

Original Complaint Filed: August 16, 2022
Amended Complaint Filed: October 25, 2022
Trial Date: None Set.

1 **TO THE COURT, DEFENDANT, AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on June 10, 2025 at 10:30 a.m., or as soon thereafter as this
3 matter may be heard, in Department 11 of the Spring Street of Los Angeles County Superior Court
4 located at 312 N Spring St, Los Angeles, CA 90012, plaintiff Ricardo Antonio Perez Flores
5 (“Plaintiff”), on behalf of himself and other similarly situated employees of defendant L.A.
6 Hardwood Flooring, Inc. (“Defendant”) (Plaintiff and Defendant collectively referred to herein as
7 “the Parties”), will and hereby move this Court pursuant to California Code of Civil Procedure § 382
8 and California Rules of Court 3.769 for an order as proposed:

9 1. Preliminarily approving the proposed class-wide settlement of this action as set forth
10 in the Parties’ Class Action and PAGA Settlement Agreement (“Settlement Agreement”), attached
11 as Exhibit 1 to the Supplemental Declaration of Alvin B. Lindsay in Support of Plaintiff’s Motion
12 for Preliminary Approval (“Lindsay Decl.”);

13 2. Approving the form and method for providing notice to the Class Members and
14 approving the form and content of the Notice of Class and PAGA Action Settlement (“Class
15 Notice”) for sending to the Class Members (attached as Exhibit A to the Settlement Agreement);

16 3. Approving for mailing the Class Notice packet and directing that it be sent to the
17 Class Members;

18 4. Appointing Plaintiff Ricardo Antonio Perez Flores as Class Representative for
19 settlement purposes only;

20 5. Appointing David Yeremian of David Yeremian & Associates, Inc., and Emil
21 Davtyan, Alvin B. Lindsay, Enoch Kim, and Melissa Rodriguez of D.Law, Inc. as Class Counsel
22 for settlement purposes only;

23 6. Scheduling a Final Approval hearing date to consider Plaintiff’s request for Final
24 Approval of the proposed Settlement and Plaintiff’s application for attorneys’ fees and costs; and

25 7. Pursuant to Labor Code § 2699.3(b)(4), Plaintiff seeks approval of the proposed
26 settlement’s allocation of funds to claims made under Labor Code §§ 2698, *et seq.*, the Private
27 Attorneys General Act of 2004 (“PAGA”).

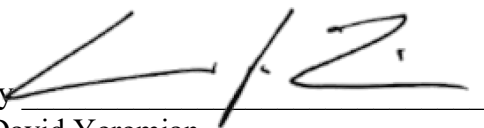
28 This Motion is made on the grounds that, after good-faith, arms’ length negotiations, the

1 Parties have agreed upon a Settlement that is fair, reasonable, and adequate and in the best interests
2 of the Class and all Parties. This Notice of Motion and Motion is also based on the fact that this
3 Settlement was the product of informed, non-collusive negotiations by the Parties, who were
4 represented by experienced and able counsel and assisted by a neutral third-party mediator. *See*
5 *Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation
6 (Second) (1985) § 30.44. The proposed Settlement meets the legal standard for preliminary approval
7 and is in the best interests of the Class; the proposed form of notice explains the Settlement terms
8 clearly and straightforwardly; the proposed procedures for notice provide the best practical notice
9 to the Class; and Class Members will have an opportunity to participate in and/or object to the
10 settlement and/or opt-out of the settlement.

11 This Motion is based upon this Notice of Motion, the accompanying Supplemental
12 Declaration of Alvin B. Lindsay in Support of Plaintiff's Motion for Preliminary Approval, the
13 Amended [Proposed] Order granting the Motion, Plaintiff's December 18, 2024 Motion for
14 Preliminary Approval of the Parties' MOU and the accompanying documents, the Court's record of
15 this action, all matters of which the Court may take notice, and upon such oral or documentary
16 evidence as the Court may receive at or before the hearing on this unopposed Motion.

17
18 DATED: May 16, 2025

D.LAW, INC.

19
20 By 

21 David Yeremian
22 Alvin B. Lindsay
23 Enoch J. Kim
24 Melissa Rodriguez
25 Attorneys for Plaintiff Ricardo Flores
26 and the Settlement Class
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