

AEGIS LAW FIRM, PC

Samuel A. Wong, State Bar No. 217104
Kashif Haque, State Bar No. 218672
Jessica L. Campbell, State Bar No. 280626
Kristy R. Connolly, State Bar No. 328477
9811 Irvine Center Drive, Suite 100
Irvine, California 92618
Telephone: (949) 379-6250
Facsimile: (949) 379-6251
Email: kconnolly@aegislawfirm.com

Attorneys for Plaintiffs Andrew Aragon, Alice Triplett,
and Dondero Fox, individually, and on behalf of all others
similarly situated

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

ANDREW ARAGON and ALICE TRIPLETT,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

STREETPLUS CA, LLC; DOES 1 through 20,
inclusive,

Defendant.

Case No. 22STCV28593

*Assigned for All Purposes to:
Hon. Elihu M. Berle, Dept. 6*

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

Date: August 16, 2024
Time: 9:00 a.m.
Dept: 6

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

3 PLEASE TAKE NOTICE that on August 16, 2024 at 9:00 a.m., or as soon thereafter as the
4 matter may be heard in Department 6 of the above-entitled Court located at 312 North Spring Street, Los
5 Angeles, CA 90012, Plaintiffs Andrew Aragon, Alice Triplett, and Dondero Fox (“Plaintiffs”) will and
6 hereby do move this Court for an Order:

- 7 1. Granting preliminary approval of the proposed Class Action and Paga Settlement
- 8 Agreement and Class Notice (“Settlement Agreement” or “Agreement”);
- 9 2. Conditionally certifying the proposed Class for settlement purposes only;
- 10 3. Appointing Plaintiffs Andrew Aragon, Alice Triplett, and Dondero Fox as the Class
- 11 Representatives;
- 12 4. Appointing Aegis Law Firm, PC as Class Counsel;
- 13 5. Appointing Apex Class Action Administration as the Settlement Administrator and
- 14 authorizing Apex Class Action Administration to send notice of the Settlement to the Class
- 15 Members; and
- 16 6. Setting a final approval hearing date.

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

22 ///

23 ///

24 ///

25 ///

26 ///

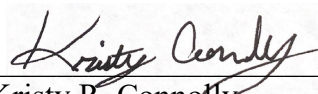
27 ///

28 ///

1 The Motion is based on this Notice of Motion, Plaintiff's Motion for Preliminary Approval of
2 Class Action Settlement, the Declaration of Kristy R. Connolly, the Declaration of Andrew Aragon,
3 the Declaration of Alice Triplett, the Declaration of Dondero Fox, and the Declaration of Sean Hartranft
4 on behalf of Apex Class Action, LLC, and on all records and documents on file, together with such oral
5 and documentary evidence that may be presented at the hearing on this matter.

6
7 Dated: June 24, 2024

AEGIS LAW FIRM, PC

8
9 By: 
10 Kristy R. Connolly
11 Attorneys for Plaintiffs
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28