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SUPERIOR COURT OF CALIFORNIA
COUNTY OF PLACER

MAZIE MARTIN, individually and on behalf of similarly situated employees, Plaintiff, v. TWIN ROCKS ESTATE VINEYARDS AND WINERY, INC., a California corporation; ANGELA SEHR, an individual; JIM SEHR, an individual; and DOES 1 through 25, inclusive, Defendants.	Case No. S-CV0055350 **CLASS ACTION** **PLAINTIFFS' NOTICE OF MOTION AND MOTION IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Date: December 10, 2026 Time: 8:30 a.m. Dept.: 3 Trial Date: None Set

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 10, 2026, at 8:30 a.m., in Department 3 of the Superior Court of California, County of Placer, at 101 Maple Street, Auburn, California 95603, or as soon thereafter as this matter may be heard, Plaintiff Mazie Martin will move for an order preliminarily approving the proposed class action and Private Attorneys General Act (PAGA) settlement with Twin Rocks Estate Vineyards and Winery, Inc., Angela Sehr, and Jim Sehr, on the terms in the signed Memorandum of Understanding ("Agreement" or "Settlement").

The motion seeks the following relief:

1. Preliminarily certifying the proposed class herein for purposes of settlement;

2. Preliminarily appointing Plaintiffs Mazie Martin and Susana Mullen as Class Representatives for purposes of settlement and for a class representative enhancement to each of them in the amount of $10,000;
3. Preliminarily appointing NorCal Advocates as Class Counsel for purposes of settlement;
4. Preliminarily approving the proposed class action and PAGA settlement in the amount of $550,000, which is incorporated herein by reference;
5. Preliminarily appointing Apex Class Action as the Settlement Administrator and for payment to Apex Class Action for administering said class action settlement in an amount not to exceed $4,985;
6. Preliminarily approving the settlement of claims under the PAGA for the total amount of $25,000, 65% of which will be paid to the Labor and Workforce Development Agency and 35% of which will be paid to Aggrieved Employees;
7. Approving as to form and content the Notice of Settlement, which provides Class Members information regarding the Settlement, their ability to opt out of, or object to, the Settlement, and which provides instruction on how to dispute an individual's settlement allocation under the proposed Settlement;
8. Approving the proposed procedures to notify the class and determining that they comply with Class Members' due process rights and directing the Notice of Settlement to be sent by first class mail to Class Members;
9. Directing Defendants to report employment information as set forth in the Agreement to the Settlement Administrator to administer the settlement proceeds;
10. Scheduling a fairness hearing on the question of whether the proposed Settlement should be finally approved as fair, reasonable and adequate;
11. Directing that any funds from settlement checks that were not cashed by the check cashing deadline be delivered to the State of California Unclaimed Property fund in the name of the employee; and

12. Preliminarily approving and adopting the Proposed Order and its implementation schedule, which is filed herewith and incorporated by reference.

This motion is made under Code of Civil Procedure section 382, California Rules of Court, rules 3.766 and 3.769, and Labor Code sections 2699 and 2699.3. It is based on this notice, the accompanying memorandum of points and authorities, the declaration of Brittany V. Berzin and exhibits, the declarations of Mazie Martin and Susana Mullen, the pleadings on file, and any further admissible evidence and oral argument presented at the hearing.

Pursuant to Local Rule 20.2.3, the court will issue a tentative ruling for this matter on the court day before the hearing. The tentative ruling will be available after 12:00 noon on the court's website, www.placer.courts.ca.gov. The tentative ruling shall become the final ruling on the matter and no hearing will be held unless oral argument is timely requested or the tentative ruling indicates otherwise. Requests for oral argument must be made by calling (916) 408-6481 no later than 4:00 p.m. on the court day prior to the hearing.

Dated: November 16, 2026

EMPLOYEE & CONSUMER ADVOCATES OF NORTHERN CALIFORNIA PC

By: Brittany Berzin
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