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and Aggrieved Employees*

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

NORMANDY VAMOS and FRANKLIN
BOONE, individuals; and on behalf of all others
similarly situated;

Plaintiffs,

vs.

AMERICAN IDOL PRODUCTIONS, INC., a
California corporation; AMERICAN
BROADCASTING COMPANIES, INC., a
Delaware corporation; FREMANTLEMEDIA
NORTH AMERICA, INC., a California
corporation; INDUSTRIAL MEDIA, INC., a
California corporation; 19 ENTERTAINMENT,
INC., a New York corporation; DOES 1-10,
business entities, forms unknown; DOES 11-20,
individuals; and DOES 21-30, inclusive,

Defendants.

Case No.: 23STCV02514

**NOTICE OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT AND CERTIFICATION OF
A SETTLEMENT CLASS**

Date: May 27, 2025
Time: 10:00 a.m.
Dept.: 7
Judge: Hon. Samantha P. Jessner

Action Filed: February 3, 2023
Trial Date: Not Set

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 NOTICE IS HEREBY GIVEN that on May 27, 2025, at 10:00 a.m. or as soon thereafter as the
3 matter may be heard before the above-entitled court, located at 312 North Spring Street, Los Angeles,
4 CA 90012, in Department 7, Plaintiff Franklin Boone and the putative class (“Plaintiff”) will and
5 hereby does move the court for an order granting preliminary approval of a class action settlement,
6 which is memorialized in the Parties’ Class Action and PAGA Settlement Agreement and Class Notice
7 (“Settlement Agreement”).

8 Plaintiff will further move the Court for an Order:

- 9 1. Certifying a Class for settlement purposes;
- 10 2. Appointing Franklin Boone as Class Representative for settlement purposes;
- 11 3. Appointing Plaintiff’s Counsel, Payton Employment Law, PC as Class Counsel;
- 12 4. Appointing Simpluris as Settlement Administrator;
- 13 5. Approving the proposed Class Notice specified in the Settlement Agreement to be
14 mailed to the Class Members;
- 15 6. Approving the opt out and objection procedures provided in the Settlement Agreement;
- 16 and
- 17 7. Setting a Final Approval Hearing pursuant to the Court’s availability.

18 Plaintiff’s motion is based on this notice of motion, the attached memorandum of points and
19 authorities, the declaration of Plaintiff Franklin Boone, declaration of Attorney Chantal McCoy Payton,
20 the declaration of Johnny Darnell Griggs, the declaration of Denise Islas; the papers and pleadings on
21 file herein, and upon such other documentation and argument as may be presented to the court at the
22 hearing on the motion.

23 Respectfully submitted,

24 Dated: March 26, 2025

PAYTON EMPLOYMENT LAW, PC

25 By: 
26 Chantal M. Payton, Esq.
27 Johnny Darnell Griggs, Esq.
28 Attorneys for Plaintiff Franklin Boone, the
putative class, and Aggrieved Employees