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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SACRAMENTO**
10

11 ALICIA WILSON, individually and on behalf
12 of all others similarly situated,

13 Plaintiff,

14 vs.

15 OHGANE, INC.; PETER KIM, an individual;
Does 1 Through 20, Inclusive,

16 Defendants.
17
18
19
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Case No. 34-2023-00333601

CLASS ACTION

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

Date: August 30, 2024
Time: 9:00 am
Dept.: 23
Res. #: A-333601-001

Action Filed: March 8, 2023
Trial Date: Not Set

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on August 30, 2024 at 9:00 am, in Department 23 of the above-entitled Court, Plaintiff Alicia Wilson, individually and on behalf of all similarly situated individuals, will, and hereby does, move for entry of an Order for the following:

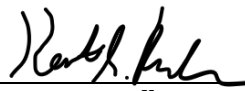
1. Provisionally and conditionally certifying the proposed class herein for purposes of settlement;
2. Preliminarily appointing Plaintiff Alicia Wilson as class representative for purposes of settlement;
3. Preliminarily and conditionally approving the payment of class representative enhancement award of \$15,000.00 to Plaintiff;
4. Preliminarily appointing the firm of Castle Law, California Employment Counsel, PC, as class counsel for purpose of settlement;
5. Preliminarily and conditionally approving the proposed class action settlement of \$450,000, which is incorporated herein by reference;
6. Preliminarily and conditionally approving the application for payment to class counsel of reasonable costs in an amount not to exceed \$30,000.00;
7. Preliminarily and conditionally approving the PAGA Penalty payment totaling \$50,000, of which \$37,500 will be paid as penalties to the LWDA and \$12,500 will be paid to the PAGA Members on a pro-rata basis;
8. Preliminarily and conditionally approving the appointment of ILYM Group[as the class action settlement administrator and for payment to ILYM Group for administering said class action settlement in an amount estimated at \$15,950;
9. Preliminarily and conditionally approving the application for payment to class counsel of reasonable attorneys' fees in the amount of \$150,000 (33% of Settlement Amount);
10. Approving as to form and content the proposed Notice of Proposed Class Action Settlement ("Class Notice"), which provides the settlement class information regarding the settlement, their ability to participate, opt out of, or object to, the class action settlement and which provides instruction on how to dispute an individual's settlement allocation under the proposed settlement agreement;

- 1 11. Approving the proposed procedures to notify the class and determining that the
2 proposed notification procedures and process complies with class members' due process
3 rights and directing the Class Notice to be mailed by first class mail to the settlement
4 class members;
5 12. Directing Defendants to report employment information, including social security
6 numbers, to the claims administrator to administer the settlement proceeds;
7 13. Scheduling a fairness hearing on the question of whether the proposed settlement should
8 be finally approved as fair, reasonable, and adequate as to the members of the
9 settlement class;
10 14. Directing that any residue from settlement checks that were not cashed within 180 days
11 of issuance be distributed to the California State Controller Unclaimed Property Fund in
12 that Class Member's name subject to Court approval; and
13 15. Preliminarily and conditionally approving and adopting the Proposed Order and its
14 implementation schedule, which is filed herewith and incorporated by reference.

15 This motion is being made pursuant to Civil Procedure Code section 382, Labor Code
16 section 2699(l), and California Rule of Court 3.769 on the grounds that the proposed class action
17 and Private Attorneys General Act settlement is fair, reasonable, and adequate as to all class
18 members and should be approved by the Court. This motion will be based on the notice of motion,
19 memorandum of points and authorities, the Declarations of Timothy B. Del Castillo and Kent L.
20 Bradbury, the Declaration of Plaintiff Alicia Wilson, exhibits, the record and files of this case, and
21 any further oral or documentary evidence introduced at the hearing of this motion.

22 Dated: July 2, 2024

CASTLE LAW: CALIFORNIA EMPLOYMENT
COUNSEL, PC

24 By 
25 Kent L. Bradbury
26 Timothy B. Del Castillo
27 Attorneys for Plaintiff Alicia Wilson and the
28 Class