

1 JAMIE K. SERB, ESQ. (SBN 289601)
jamie@crosnerlegal.com
2 ZACHARY M. CROSNER, ESQ. (SBN 272295)
zach@crosnerlegal.com
3 **CROSNER LEGAL, PC**
4 9440 Santa Monica Blvd. Suite 301
Beverly Hills, CA 90210
5 Tel: (866) 276-7637
Fax: (310) 510-6429

6
7 Attorneys for Plaintiff AUSTIN EASLEY, as an individual and on
behalf of all others similarly situated

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF ORANGE**

11
12 AUSTIN EASLEY, as an individual on
behalf of himself and on behalf of all others
13 similarly situated,

14 Plaintiff,

15 vs.

16 PARADISE DYNASTY LLC, a Delaware
17 limited liability company; PARADISE
GROUP HOLDINGS USA INC., a
18 Delaware corporation; PARADISE RAMEN
19 LLC, a Delaware limited liability company;
DPPA GROUP INC, a California
20 corporation; and DOES 1-100, inclusive,

21 Defendants.
22
23
24
25
26
27
28

Case No.: 30-2022-01291762-CU-OE-CXC

Assigned for All Purposes to:
Hon. Layne H. Meltzer
Dept. CX-102

NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT AND REQUEST
FOR ATTORNEY'S FEES AND COSTS

[Filed Concurrently with Memorandum of Points
& Authorities; Declarations of Nikki Trenner,
Austin Easley, and Mary Butler; [Proposed]
Order]

Date: March 14, 2025
Time: 1:30 p.m.
Dept.: CX-102

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

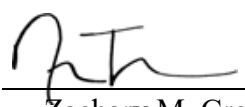
2 PLEASE TAKE NOTICE THAT on March 14, 2025, at 1:30 p.m., or as soon thereafter as
3 the matter may be heard, in Department CX-102 of the above-entitled Court, located at 751 West
4 Santa Ana Blvd., Santa Ana, California, Plaintiff Austin Easley ,on behalf of himself and the
5 conditionally certified settlement class, will and hereby does move the Court for an order granting
6 final approval of the proposed class and PAGA action settlement, approving the payment of civil
7 penalties, approving the class representative service payment provided for the class action
8 settlement, and approving payment of the Settlement Administrator's fees and expenses. Plaintiff
9 also will and hereby does move the Court for an order granting an award of attorney's fees in the
10 amount of \$96,666.67 (1/3 of the gross settlement amount) and costs in the amount of \$14,458.40,
11 as provided in the proposed class action settlement.

12 This motion is brought under California Rule of Court 3.769, on the grounds that the
13 settlement is fair, reasonable and adequate and in the best interests of the class, and meets all
14 requirements for class certification. The requested class representative service payment is fair and
15 reasonable under the circumstances of the case. The requested attorney's fees and costs are fair
16 and reasonable under the circumstances of the case.

17 The motion will be based upon this notice of motion and motion, the accompanying
18 memorandum of points and authorities, declarations of Nikki Trenner, Austin Easley, and Mary
19 Butler, the Settlement Agreement, the Court's entire file herein, and on such other argument and
20 evidence as the Court may entertain at the hearing on this motion.

21
22 Dated: February 24, 2025

CROSNER LEGAL, PC

23
24
25 By: 

Zachary M. Crosner, Esq.

Jamie K. Serb, Esq.

Nikki Trenner, Esq.

Attorneys for Plaintiff AUSTIN EASLEY