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9 Attorneys for Plaintiff(s),

10 VICKIE WILLIAMS, and all others similarly situated

11 (Additional attorneys for Plaintiff(s) on following page)

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF SOLANO**

14 **(UNLIMITED JURISDICTION)**

15 VICKIE WILLIAMS, on behalf of herself, all  
16 others similarly situated, the general public, and  
17 as an “aggrieved employee” on behalf of other  
18 “aggrieved employees” under the Labor Code  
19 Private Attorneys General Act of 2004,

20 *Plaintiff(s),*

21 vs.

22 VALLEJO HOSPITALITY LLC, California  
23 limited liability company; THREE65  
24 HOSPITALITY LLC, a California limited  
25 liability company; and DOES 1–50, inclusive,

26 *Defendant(s).*

Case No. FCS059352

**PLAINTIFF VICKIE WILLIAMS’S  
NOTICE OF MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Hearing Date: November 12, 2026

Hearing Time: 9:00 a.m.

Hearing Dept.: 8, The Honorable Wendy  
G. Getty

Action filed: November 30, 2022

Trial Date: Not Set

**Submitted Herewith Under Separate  
Cover:**

1. Memorandum of Points and Authorities;
2. Declaration(s) of David Spivak, Walter L. Haines, and Vickie Williams; and
3. [Proposed] Order



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1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on November 12, 2026 at 9:00 a.m., or as soon thereafter  
3 as the matter may be heard, in Department 8 of the Solano County Superior Court, located at Old  
4 Solano Courthouse, 580 Texas St., Fairfield, CA 94533, Plaintiff Vickie Williams (“Plaintiff”)  
5 will and hereby does move this Court for an order: (1) granting class certification of the  
6 Settlement Class solely for settlement purposes pursuant to California Code of Civil Procedure  
7 section 382; (2) preliminarily approving the Class Action and PAGA Settlement Agreement and  
8 Class Notice (the “Settlement”)<sup>[1]</sup> between Plaintiff and Defendant Vallejo Hospitality LLC  
9 (“Defendant”) (Plaintiff and Defendant are referred to below collectively as the “Parties”); (3)  
10 appointing David Spivak of The Spivak Law Firm and Walter L. Haines of United Employees  
11 Law Group as Class Counsel; (5) appointing Plaintiff as Class Representative (“Class  
12 Representative”); (6) approving the use of the proposed notice procedures and related forms; (7)  
13 directing that notice be mailed to the proposed Settlement Class; and (8) scheduling a hearing  
14 date for motion for final approval of class action settlement and awards of attorneys’ fees and  
15 costs.

16 The “Settlement Class” or “Class Member” consists of all Defendants’ hourly, non-  
17 exempt California employees during the Class Period. “Class Period” means the period from  
18 November 30, 2018 through March 17, 2025.

19 This Motion is made on the following grounds: (1) the Settlement Class meets all the  
20 requirements for class certification for settlement purposes only under California Code of Civil  
21 Procedure section 382; (2) Plaintiff and her counsel are adequate to represent the Settlement  
22 Class; (3) the Settlement reflects a fair, adequate, and reasonable compromise of all disputed  
23 claims in view of Defendants’ potential liability exposure as compared against the risks of  
24 continued litigation; (4) the proposed notice procedures and related forms adequately apprise the  
25 Class Members of their rights under the Settlement and fully comport with due process; and (5)  
26 in view of the foregoing, notice should be disseminated to the Class Members and a hearing date  
27 for motion for final approval of class action settlement, and awards of attorneys’ fees and costs  
28 should be set.



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1 The Motion is based on this Notice of Motion and Motion, the attached Memorandum of  
2 Points and Authorities, the Declarations of David Spivak, Walter L. Haines, and Vickie Williams,  
3 all papers and pleadings on file with the Court in this action, all matters judicially noticeable, and  
4 on such oral and documentary evidence as may be presented in connection with the hearing on  
5 the Motion.

6 Respectfully submitted,

7  
8 THE SPIVAK LAW FIRM

9 Dated: July 22, 2026

By:



10 DAVID G. SPIVAK, Attorneys for  
11 Plaintiff, VICKIE WILLIAMS, and all  
12 others similarly situated  
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