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Attorneys for Plaintiffs and the Putative Classes

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

QUINCY GRIFFIN PERKINS, JOSE
JOHNSON, IGNACIO PARKS, AND
TIWAN JOHNSON, individually and
on behalf of all others similarly
situated,

Plaintiff,

v.

HADCO METAL TRADING SANTA
FE
SPRINGS CA dba RYDER
INTEGRATED
LOGISTICS INC.: and DOES 1-50,
inclusive,

Defendants.

Lead Case No. 3:23-cv-00502-WHO
[Consolidated for all purposes with
Case No. 3:23-cv-01694-WHO &
Case No. 4:22-cv-07456-JST]

[Assigned to the Honorable William H.
Orrick] Dept.: Courtroom 2

FRCP RULE 23 CLASS ACTION

**NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION/PAGA
SETTLEMENT; MEMORANDUM
OF POINTS AND AUTHORITIES
IN SUPPORT OF THEREOF;
DECLARATIONS IN SUPPORT
THEREOF; [PROPOSED] ORDER**

Date: May 29, 2024
Time: 02:00 p.m.

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the matter may be heard before the Honorable William H. Orrick on Wednesday, May 29, 2024 at 2:00 p.m. in Courtroom 2 of this Court, located at 450 Golden Gate Avenue, San Francisco, CA 94102. Plaintiffs respectfully requests entry of an order (1) preliminarily certifying a class for settlement purposes under the Federal Rules of Civil Procedure, Rule 23 (e.g., “Rule 23”) as defined in the Parties’ Class Action and PAGA Settlement Agreement and Amendment Thereto; (2) preliminarily approving the parties’ Settlement; (3) preliminarily appointing Plaintiffs Quincy Griffin Perkins, Jose Johnson, Ignacio Parks, and Tiwan Johnson as Class Representatives for the Class and Plaintiffs’ counsel as Class Counsel; (4) approving the form of the Parties’ proposed Notice of Class Action and PAGA Settlement; and (5) scheduling a hearing on the final approval of the Settlement and approval of the application of Class Counsel and Plaintiffs for their requested attorneys’ fees, costs, and enhancement awards.

Plaintiffs respectfully submit good cause exists for granting the Motion for Preliminary Approval for the reasons set forth in the concurrently filed documents. Defendants’ counsel has reviewed the documents being filed in support of this Motion and does not oppose it.

The basis for this Motion is that the proposed Settlement is fair, adequate, and reasonable and in the best interests of the Class Members as a whole, and the procedures proposed by the parties are adequate to ensure the opportunity of Class Members to participate in, opt out of, or object to the Settlement.

This Motion is based upon this Notice of Motion and Motion, the Memorandum of Points and Authorities, including the Settlement Agreement, the Amendment to the Settlement Agreement, Declarations of Class Counsel and any of their exhibits, the declarations of the named Plaintiff/Class Representatives; the [Proposed] Order granting preliminary approval, and the other pleadings and records on file in this action, and the presentations of counsel and such oral or documentary evidence as may be presented

1 at the hearing on this unopposed Motion.

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4 Dated: April 17, 2024,

JAMES HAWKINS APLC
BOKHOUR LAW GROUP, P.C.
FALAKASSA LAW, P.C.

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8 BY: /s/ James Hawkins

James Hawkins, Esq.

9 Gregory Mauro, Esq.

10 Mehrdad Bokhour, Esq.

11 Joshua Falakassa, Esq.

12 Attorneys for Plaintiffs and

13 the Putative Class
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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2024, I electronically filed the foregoing with the Clerk of the Court for the U.S. District Court, for the Northern District of California using the CM/ECF system. All participants are registered CM/ECF users, and will be served by the CM/ECF system.

Dated: April 17, 2024

/s/ Gregory Mauro

Gregory Mauro, Esq.