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Attorneys for Plaintiff YAHAIIRA ZELAYA,
on behalf of herself and others similarly situated

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

YAHAIIRA ZELAYA, an individual on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

HYDRO SYSTEMS, INC, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 22STCV38300

CLASS ACTION

Assigned for All Purposes To:
Hon. William F. Highberger

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION FOR AN ORDER
(1) PRELIMINARILY APPROVING
THE CLASS ACTION SETTLEMENT;
(2) APPROVING NOTICE OF
SETTLEMENT; (3) SETTING HEARING
FOR FINAL APPROVAL**

Date: May 12, 2026
Time: 10:30 a.m.
Dept: SS-10

1 **TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on May 12, 2026 at 10:30 a.m., or as soon thereafter as this
3 matter may be heard, at Department 10, located at 312 North Spring Street, Los Angeles,
4 California 90012, Plaintiff Yahaira Zelaya (“Plaintiff”), on behalf of herself and all persons
5 similarly situated, will and hereby moves this Court pursuant to California Code of Civil
6 Procedure § 382 and California Rule of Court 3.769 for an order:

7 (1) Preliminarily approving the class action settlement reached between Plaintiff and
8 Defendant Hydro Systems, Inc. (“Defendant”), including granting preliminary
9 approval of the following class: all persons employed by Defendant in California and
10 classified as non-exempt, hourly employees who worked for Defendant at any time
11 between February 5, 2021 through January 6, 2025.

12 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
13 the class; and

14 (3) Setting the final approval hearing.

15 Pursuant to California Labor Code § 2699.3(b)(4), the Parties also seek approval of the
16 proposed settlement’s allocation of funds to claims made under the Labor Code Private Attorneys
17 General Act of 2004 (“PAGA”).

18 Pursuant to the proposed Class Action and PAGA Settlement Agreement (“Settlement” or
19 “Settlement Agreement”), filed concurrently herewith, Defendant does not oppose the
20 preliminary approval of the class action settlement.

21 Under the terms of the Settlement, the parties have agreed that all claims brought on
22 behalf of the Class Members shall be fully and finally resolved for the total sum of Four Hundred
23 and Eighty-Five Thousand Dollars and Zero Cents (\$485,000.00) (“Gross Settlement Amount”)
24 to be paid on a non-reversionary basis. The amount remaining of the Gross Settlement Amount
25 after the following deductions have been made (“Net Settlement Amount”) shall be available for
26 distribution to Class Members who do not opt out of the settlement:

- 27 • not more than One Hundred Sixty-One Thousand Six Hundred Sixty-Six Dollars
28 and Sixty-Seven Cents (\$161,666.67) to Class Counsel for attorneys’ fees, and not

1 more than Twenty Thousand Dollars and Zero Cents (\$20,000.00) to Class
2 Counsel for litigation costs;

- 3 • not more than Five Thousand Nine Hundred Ninety Dollars and Zero Cents
4 (\$5,990.00) for the Settlement Administration Costs;
- 5 • not more than Five Thousand Dollars and Zero Cents (\$5,000.00) to Plaintiff for a
6 Class Representative Enhancement Payment; and
- 7 • Thirty Thousand Dollars and Zero Cents (\$30,000.00) for civil penalties under the
8 PAGA, where 75% (\$22,500.00) will be paid to the LWDA and 25% (\$7,500.00)
9 will be included in the Net Settlement Amount and distributed to Settlement Class
10 Members.

11 This Notice of Motion and Motion is based on the fact that this is a fair and reasonable
12 settlement that benefits the class and was the product of informed, non-collusive negotiations by
13 the parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.*,
14 48 Cal. App. 4th 1794, 1802 (1996); MANUAL FOR COMPLEX LITIGATION (SECOND) (1985)
15 § 30.44. The proposed settlement meets the legal standard for preliminary approval and is in the
16 best interests of the class; the proposed form of notice explains the settlement terms in a clear and
17 straightforward manner; the proposed procedures for notice provide the best practical notice to
18 the class; and Class Members will have an opportunity to participate in and/or object to the
19 settlement and/or opt-out of the settlement.

20 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto
21 (including the Notice to Class Members), the accompanying Memorandum of Points and
22 Authorities, the Declarations of Yahaira Zelaya, Natalie Haritounian, David Yeremian, and Jarrett
23 Gorlick, the pleadings, records and files in the case, and such other further oral and documentary
24 evidence which may be submitted at or before the hearing on this Motion.

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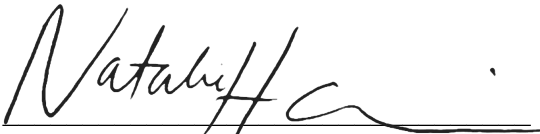
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1 Dated: February 13, 2026

Respectfully submitted,

2 D.LAW, INC.

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4 By 
5 Natalie Haritonian
6 Attorneys for Plaintiff, Yahaira Zelaya on behalf
7 of herself and others similarly situated
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