

James R. Hawkins (SBN 192925)
Christina M. Lucio (SBN 253677)
Mitchell J. Murray (SBN 285691)
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
james@jameshawkinsaplc.com
christina@jameshawkinsaplc.com
mitchell@jameshawkinsaplc.com

Attorneys for Plaintiff LOUIS C BERREYES
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

LOUIS C BERREYES, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

SOUTHERN CALIFORNIA GAS COMPANY, a
California Corporation and DOES 1-5- inclusive,

Defendants.

Case No. CIVSB2207291

Assigned for all purposes to
Hon. Joseph T. Ortiz
Dept. S-17

**NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA REPRESENTATIVE ACTION
SETTLEMENT**

Date: September 25, 2025
Time: 1:30 p.m.
Dept.: S-17

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

2 **PLEASE TAKE NOTICE** that on September 25, 2025 at 1:30 p.m. or as soon thereafter as
3 counsel may be heard, in Department S-17 of the above-captioned court, located at 247 West Third
4 Street, San Bernardino, CA 92415, the Honorable Joseph T. Ortiz presiding, Plaintiff Louis Berreyes
5 will and hereby does move this Court to: (1) preliminarily approve the settlement set forth in the Joint
6 Stipulation of Class and PAGA Representative Action Settlement, attached as Exhibit 1 to the
7 Declaration of James Hawkins; (2) conditionally certify the proposed Settlement Class; (3) appoint Louis
8 Berreyes as the Class Representative; (4) appoint James R. Hawkins and Christina M. Lucio of James
9 Hawkins APLC as Class Counsel; (5) approve distribution of the proposed Court Approved Notice of
10 Class Action Settlement and Hearing Date for Final Court Approval (“Notice of Class Action
11 Settlement”) to the Participating Class; (6) appoint ILYM Group, Inc. as the Settlement Administrator;
12 and (7) set a hearing date for final approval of the settlement.

13 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
14 Authorities in support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
15 the Declarations of James Hawkins and Louis Berreyes; (4) the Joint Stipulation of Class and PAGA
16 Representative Action Settlement; (5) the proposed Notice of Class Action Settlement; (6) the
17 [Proposed] Order Granting Preliminary Approval of Class Action Settlement; (7) the records, pleadings,
18 and papers filed in this action; and (8) upon such other documentary and oral evidence or argument as
19 may be presented to the Court at or prior to the hearing of this Motion.

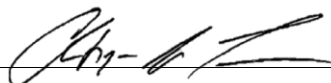
20 As this Motion is unopposed, the Parties respectfully request relief from the page limit
21 requirement set by California Rules of Court, Rule 3.1113(d).

22 Dated: July 9, 2025

Respectfully submitted,

23 **JAMES HAWKINS APLC**

24 By: _____



25 James R. Hawkins
26 Christina M. Lucio

27 Attorneys for Plaintiff Louis Berreyes, on behalf of
28 himself and all others similarly situated