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Attorneys for Plaintiffs Benjamin Edward Seilhamer and
Trevor West, individually, and on behalf of all others
similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

BENJAMIN EDWARD SEILHAMER and
TREVOR WEST, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

GUITAR CENTER STORES, INC.; and DOES
1 through 20, inclusive,

Defendants.

Case No. 23STCV00544

Assigned for all purposes to:

Hon. Elihu M. Berle

Dept. 6

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

Date: August 18, 2025

Time: 10:00 a.m.

Dept: 6

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

2 PLEASE TAKE NOTICE that on August 18, 2025 at 10:00 a.m., or as soon thereafter as the
3 matter may be heard in Department 6 of the above-entitled Court located at 312 North Spring Street, Los
4 Angeles, CA 90012, Plaintiffs Benjamin Edward Seilhamer and Trevor West (“Plaintiffs”) will and
5 hereby do move this Court for an Order:

- 6 1. Granting preliminary approval of the proposed CLASS AND PAGA SETTLEMENT
7 AGREEMENT (“Settlement Agreement” or “Agreement”);
- 8 2. Conditionally certifying the proposed Class for settlement purposes only;
- 9 3. Appointing Plaintiffs Benjamin Edward Seilhamer and Trevor West as the Class
10 Representatives;
- 11 4. Appointing Aegis Law Firm, PC as Class Counsel;
- 12 5. Appointing Atticus Administration, LLC as the Settlement Administrator and authorizing
13 Atticus Administration, LLC to send notice of the Settlement to the Class Members; and
- 14 6. Setting a final approval hearing date.

15 Pursuant to California Rules of Court 3.769(d) and (e), the Motion is made on the grounds that the
16 proposed Settlement Agreement satisfies all criteria for preliminary approval under California law and
17 falls well within the range of reasonableness; the Agreement was reached through informed, arms-
18 length bargaining between experienced attorneys, and Plaintiffs and Class Counsel will fairly and
19 adequately represent the Class Members.

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1 The Motion is based on this Notice of Motion, Plaintiff's Memorandum of Points and
2 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement, the Declaration
3 of Kristy R. Connolly, the Declaration of Benjamin Edward Seilhamer, the Declaration of Trevor West,
4 the Declaration of Bryn Bridley of Atticus Administrations, LLC, and on all records and documents on
5 file, together with such oral and documentary evidence that may be presented at the hearing on this
6 matter.

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8 Dated: July 22, 2025

AEGIS LAW FIRM, PC

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10 By: /s/ Kristy R. Connolly

Kristy R. Connolly

Attorneys for Plaintiffs
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