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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SUTTER

ANTHONY MEDINA and MARIO ALEJANDRO ZAVALA, on behalf of themselves and all others similarly situated, Plaintiffs, vs. PAPERBOARD PACKAGING CORPORATION, an Idaho corporation; PAPERBOARD PACKAGING CORP, an entity of unknown form; AMCOR FLEXIBLES NORTH AMERICA, INC., a Missouri corporation; AMCOR, an entity of unknown form; and DOES 1 through 50, inclusive, Defendants.	**CLASS ACTION** Case No. CVCS24-0002240 Assigned for All Purposes To: Honorable Tahmina Morrow **NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** *[Filed concurrently with Memorandum of Points and Authorities; Declarations of Enoch J. Kim, Anthony Medina and Mario Alejandro Zavala, Kimberly Sutherland; and [Proposed] Order Granting Plaintiff's Motion for Preliminary Approval]* Hearing Information: Date: January 11, 2027 Time: 9:00 a.m. Action filed: September 20, 2024 FAC Filed: January 19, 2026 Trial date: None Set

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on behalf of himself and others similarly situated

TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 11, 2026, at 9:00 a.m. in the Sutter Superior Court located at 1175 Civic Center Blvd., Yuba City, CA 95993, Plaintiffs Anthony Medina and Mario Alejandro Zavala ("Plaintiffs"), on behalf of themselves, and other similarly situated employees of Defendants Paperboard Packaging Corporation, Paperboard Packaging Corp, Amcor Flexibles North America, Inc., and Amcor ("Defendants") (collectively, the "Parties"), will and hereby does move this Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order as proposed:

1. Preliminarily approving the proposed class-wide settlement of this action as set forth in the Class Action and PAGA Settlement Agreement ("Settlement Agreement"), which is attached as Exhibit 1 to the Declaration of Enoch J. Kim ("Kim Decl."), filed herewith.

2. Approving the form and method for providing notice to the Class Members and approving the form and content of the Parties' proposed Notice of Class Action Settlement and Hearing Date for Final Court Approval ("Class Notice") for sending to the Class Members (provided at Exhibit A to the Settlement Agreement).

3. Appointing Plaintiffs Anthony Medina and Mario Alejandro Zavala as Class Representatives for settlement purposes only.

4. Appointing D.Law, Inc. and Moon Law Group, PC as Class Counsel for settlement purposes only.

5. Scheduling a Final Approval hearing date to consider the Parties' request for Final Approval of the proposed Settlement and Plaintiff's application for Class Counsel's Fees and Litigation Expenses to Class Counsel for attorneys' fees and reasonable expenses incurred in connection with this Action, and Class Representative Service Payments to Plaintiffs for their service in this Action.

6. Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed settlement's allocation of funds to claims made under Labor Code §§ 2698, *et seq*., the Private Attorneys General Act of 2004 ("PAGA").

This Motion is made on the grounds that after good-faith, arm's length negotiations, the

Parties have agreed upon a Settlement which is fair, reasonable, and adequate and in the best interests of the Class and all Parties. Defendants do not oppose the Motion. This Notice of Motion and Motion is also based on the fact that this Settlement was the product of informed, non-collusive negotiations by the Parties, who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44. The proposed settlement meets the legal standard for preliminary approval and is in the best interests of the Class; the proposed form of Class Notice explains the Settlement terms in a clear and straightforward manner; the proposed procedures for notice provide the best practical notice to the Class; and Class Members will have an opportunity to participate in and/or object to the settlement and/or opt-out of the settlement.

This Motion is based upon this Notice of Motion, the accompanying Memorandum of Points and Authorities, the Declarations of Enoch J. Kim, Kane Moon, Anthony Medina, Mario Alejandro Zavala, and Kimberly Sutherland, the [Proposed] Order, the Parties' Settlement Agreement and Class Notice, the Court's record of this action, all matters of which the Court may take notice, and upon such oral or documentary evidence as the Court may receive at or before the hearing on this unopposed Motion.

Dated: November 20, 2026

D.LAW, INC.

By _____

Enoch J. Kim, Esq.
Bradford Smith, Esq.
Attorneys for Plaintiffs and Class