

D.LAW, INC.

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Attorneys for Plaintiff JAMIE MIGUEL MOEN,
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

JAMIE MIGUEL MOEN, an individual, on
behalf of himself and others similarly
situated,

Plaintiff,

vs.

AUTOMATED ENGINEERING
SERVICES, INC., a California stock
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 25CU042196C

CLASS ACTION

Assigned for All Purposes To:
Hon. Marcella O. McLaughlin
Dept.: C-72

**NOTICE OF MOTION AND PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

*[filed concurrently with Memorandum of Points
and Authorities; Declarations of Enoch J. Kim,
Kimberly Sutherland, and Jamie Miguel Moen;
and [Proposed] Order]*

Date: September 11, 2026
Time: 9:30 a.m.
Dept.: C-72

Original Complaint Filed: August 12, 2025
First Amended Complaint Filed: October 16,
2025
Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on September 11, 2026, at 9:30 a.m. in Department C-72 of
3 the San Diego County Superior Court located at 330 West Broadway, San Diego, California 92101,
4 Plaintiff Jamie Miguel Moen (“Plaintiff”), on behalf of himself and other similarly situated employees
5 of Defendant Automated Engineering Services, Inc. (“Defendant”) (collectively, “the Parties”), will
6 and hereby move this Court pursuant to California Code of Civil Procedure § 382 and California Rule
7 of Court 3.769 for an order as proposed:

8 1. Preliminarily approving the proposed class-wide settlement of this action as set forth
9 in the Parties’ Joint Stipulation of Class Action and PAGA Settlement and Release (“Settlement
10 Agreement”), which is attached as **Exhibit 1** to the Declaration of Enoch J. Kim (“Kim Decl.”), filed
11 concurrently herewith;

12 2. Approving the form and method for providing notice to the Class Members and
13 approving the form and content of the Parties’ proposed Court Approved Notice of Class Action
14 Settlement and Hearing Date for Final Court Approval (“Class Notice”) for sending to the Class
15 Members (provided at **Exhibit A** to the Settlement Agreement);

16 3. Approving for mailing the Court approved Class Notice and directing that it be sent to
17 the Class Members;

18 4. Appointing Plaintiff Jamie Miguel Moen as Class Representative for settlement
19 purposes only;

20 5. Appointing D.Law, Inc. as Class Counsel for settlement purposes only;

21 6. Scheduling a Final Approval hearing date to consider the Parties’ request for Final
22 Approval of the proposed Settlement and Plaintiff’s application for Attorneys’ Fees to Class Counsel
23 for attorneys’ fees, Attorneys’ Costs to Class Counsel for reasonable expenses incurred in connection
24 with this Action, and Class Representative Enhancement Payment to Plaintiff for his services in this
25 Action;

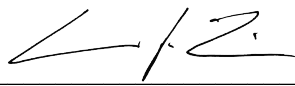
26 7. Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed
27 settlement’s allocation of funds to claims made under Labor Code §§ 2698, *et seq.*, the Private
28 Attorneys General Act of 2004 (“PAGA”).

1 This Motion is made on the grounds that, after good-faith, arm's-length negotiations, the
2 Parties have agreed upon a Settlement which is fair, reasonable, and adequate and in the best interests
3 of the Settlement Class and all Parties. Defendant does not oppose the Motion. This Notice of Motion
4 and Motion is also based on the fact that this Settlement was the product of informed, non-collusive
5 negotiations by the Parties, who were represented by experienced and able counsel. *See Dunk v. Ford*
6 *Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) §
7 30.44. The proposed Settlement meets the legal standard for preliminary approval and is in the best
8 interests of the Settlement Class; the proposed form of notice explains the Settlement terms in a clear
9 and straightforward manner; the proposed procedures for notice provide the best practical notice to
10 the Settlement Class; and Class Members will have an opportunity to participate in and/or object to
11 the Settlement and/or opt-out of the Settlement.

12 This Motion is based upon this Notice of Motion, the accompanying Memorandum of Points
13 and Authorities, the Declaration of Class Counsel Enoch J. Kim, the Declarations of Kimberly
14 Sutherland and Plaintiff Jamie Miguel Moen submitted with this Motion, the [Proposed] Order
15 Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, the
16 Court's record of this action, all matters of which the Court may take notice, and upon such oral or
17 documentary evidence as the Court may receive at or before the hearing on this unopposed Motion.

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19 DATED: August 19, 2026

D.LAW, INC.

20 By 
21 Enoch J. Kim
22 Arianna N. Razi
23 Attorneys for Plaintiff and Class
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