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7 Attorneys for Plaintiff Shawn Vasquez

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF RIVERSIDE**

10
11 SHAWN VASQUEZ, as an individual on
behalf of himself and on behalf of all others
12 similarly situated,

13 Plaintiff,

14 vs.

15 SUPER T TRANSPORT, INC., an Idaho
corporation; and DOES 1-100, inclusive,

16 Defendants.

) Case No. CVRI2300957

) Assigned for All Purposes To:

) Judge: Harold W. Hopp

) Dept: 1

) **NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

) **Date: March 21, 2025**

) **Time: 8:30 a.m.**

) **Dept. 1**

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on March 21, 2025, at 8:30 a.m. or as soon thereafter as
3 the matter may be heard, in Department 1 of the above-captioned Court, located at 4050 Main Street,
4 Riverside, California, plaintiff Shawn Vasquez will move the Court for preliminary approval of a
5 proposed class action settlement in the above-captioned action under Cal. Rule of Court 3.769. The
6 terms of the settlement are contained within the Stipulation and Settlement of Class Action and
7 PAGA Claims (“Settlement Agreement”), filed concurrently herewith as Exhibit 1 to the Declaration
8 of Brandon Brouillette. In addition, Plaintiff requests that the Court conditionally certify the class
9 described in the Settlement Agreement for purposes of settlement only; approve the form of class
10 notice attached as Exhibit A to the Settlement Agreement; approve Crosner Legal P.C. as Class
11 Counsel and plaintiff Shawn Vasquez as the Class Representative, approve Apex Class Action LLC
12 as the Settlement Administrator, and set a final approval hearing.

13 This motion will be based on this Notice of Motion and Motion, the accompanying
14 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying Declarations
15 of Brandon Brouillette, Shawn Vasquez, Shawn Jensen, Marianne Koepf, and Sean Hartranft, the
16 Court’s entire file herein, and on such further evidence and argument as may be presented at the
17 hearing.

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19 Dated: February 26, 2025

CROSNER LEGAL, PC

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21 By: 
22 Jamie Serb, Esq.
23 Brandon Brouillette, Esq.
24 Zachary M. Crosner, Esq.
25 Attorneys for Plaintiff
26 SHAWN VASQUEZ
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