

Jonathan M. Genish (State Bar No. 259031)
jgenish@blackstonepc.com
Miriam L. Schimmel (State Bar No. 185089)
mschimmel@blackstonepc.com
Joana Fang (State Bar No. 309623)
jfang@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
Jared C. Osborne (State Bar No. 335968)
josborne@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff
MARISSA HARTMAN, individually
and on behalf of others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF NAPA**

MARISSA HARTMAN, individually and on
behalf of others similarly situated,

Plaintiff,

vs.

NAPA LW HOSPITALITY
CORPORATION, a Kansas corporation;
LODGEWORKS PARTNERS, L.P., a Kansas
limited partnership; and LODGEWORKS
PAYROLL, LLC, a Kansas limited liability
company; and DOES 1 through 25, inclusive,

Defendants.

Case No.: 23CV001166

*Assigned for all purposes to the Honorable
Cynthia P. Smith, Dept. A*

NOTICE OF SETTLEMENT

Complaint Filed: September 13, 2023
Trial Date: Not Set

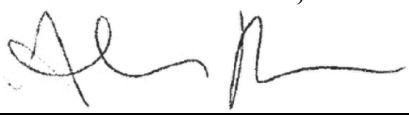
1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that Plaintiff Marissa Hartman (“Plaintiff”) and Defendants Napa
3 LW Hospitality Corporation, Lodgeworks Partners, L.P., and Lodgeworks Payroll, LLC (collectively,
4 “Defendants”) (collectively, with Plaintiff, the “Parties”) mediated this matter with Brandon
5 McKelvey, Esq. on May 14, 2024 and reached a settlement of all claims alleged in this action and the
6 action entitled *Marissa Hartman v. Napa LW Hospitality Corporation, et al.*, Napa County Superior
7 Court Case No. 23CV001459 (“PAGA Action”).

8 The Parties are currently in the process of negotiating the long-form settlement agreement.
9 The Parties have agreed that Plaintiff will seek leave to file an amended complaint in this action to
10 add the claims alleged in the PAGA Action in order to effectuate the terms of the settlement. Once
11 the long-form settlement agreement is fully executed, Plaintiff intends to move for preliminary
12 approval of the class action and PAGA settlement in this action.

13 Dated: November 4, 2024

BLACKSTONE LAW, APC

14
15 By: 

16 Miriam L. Schimmel

17 Joana Fang

Alexandra Rose

18 Jared C. Osborne

19 Attorneys for Plaintiff MARISSA HARTMAN
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PROOF OF SERVICE

I, Stephany Sinaguinan, certify and declare as follows:

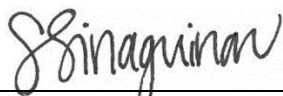
I am over eighteen years of age and not a party to the within action; my business address is 8383 Wilshire Blvd, Suite 745, Beverly Hills, California 90211. On November 4, 2024, I served a copy of the following document(s): **NOTICE OF SETTLEMENT** on the interested parties as follows:

Shannon B. Nakabayashi Benjamin R. Eversole JACKSON LEWIS P.C. 50 California Street, 9 th Floor San Francisco, CA 94111 Tel: (415) 394-9400 / Fax: (415) 394-9401 Emails: Shannon.Nakabayashi@jacksonlewis.com Benjamin.Eversole@jacksonlewis.com Belinda.Vega@jacksonlewis.com	<i>Attorneys for</i> Defendants NAPA LW HOSPITALITY CORPORATION, LODGEWORKS PARTNERS, L.P., and LODGEWORKS PAYROLL, LLC
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☒ **BY ELECTRONIC MAIL (E-MAIL):** I caused said document(s) to be delivered electronically to the addressee(s) listed above via email from email address ssina@blackstonepc.com pursuant to California Code of Civil Procedure section 1010.6(e)(1). I did not receive any electronic message or other indication that the transmission was unsuccessful.

☒ **STATE** – I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 4, 2024 at Beverly Hills, California.



Stephany Sinaguinan