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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

BRUCE KEHOE, an individual on behalf of himself and all others similarly situated, Plaintiff, v. DKD PROPERTY MANAGEMENT COMPANY, a California corporation; and DOES 1 through 50, inclusive, Defendant.	Case No.: 23CV412333 CLASS ACTION Assigned for All Purposes Hon. Theodore C. Zayner Dept.: 19 **NOTICE OF MOTION AND PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AGREEMENT** Preliminary Approval Hearing: Date: December 9, 2026 Time: 1:30 p.m. Dept.: 19 Original Complaint Filed: March 13, 2023 First Amended Complaint Filed: July 28, 2023 Trial Date: None Set

TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 9, 2026 at 1:30 p.m. in Department 19 of the Courthouse of the Santa Clara Superior Court located at 191 North First Street, San Jose, CA 95113, Plaintiff Bruce Kehoe (hereinafter, "Plaintiff"), on behalf of himself and other similarly situated employees of Defendant DKD Property Management Company ("Defendant") (collectively, "the Parties"), will and hereby do 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 Parties' Class Action and PAGA Settlement Agreement ("Settlement Agreement")[1], which is attached as Exhibit 1 to the Declaration of Enoch J. Kim, 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 and PAGA Action Settlement ("Class Notice") for sending to the Class Members (provided at Exhibit A to the Settlement Agreement);

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

4. Appointing Plaintiff Bruce Kehoe as Class Representative for settlement purposes only;

5. Appointing Natalie Haritoonian, Enoch J. Kim, Jonas Agle, and Matthew Carraher of D.Law, Inc. and David Yeremian of David Yeremian & Associates, Inc. as Class Counsel for settlement purposes only; and

6. Scheduling a Final Approval hearing date to consider the Parties' request for Final Approval of the proposed Settlement and Plaintiff's application for attorneys' fees and costs.

7. 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. Defendant does not oppose the Motion. This Notice of Motion and Motion is also based on the fact that this Settlement was the product of informed, none 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 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 Class Counsel Enoch J. Kim and David Yeremian, the Declaration of Plaintiff Bruce Kehoe submitted with this Motion, the [Proposed] Order granting the Motion, 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 13, 2026,

D.LAW, INC.

By _____
Natalie Haritoonian, Esq.
Jonas Agle, Esq.
Enoch J. Kim, Esq.
Matthew Carraher, Esq.

Attorneys for Plaintiff and Class