

12/30/2025 11:35:37 AM

Clerk of the Superior Court
By T. Automation , Deputy Clerk

1 Brooke B. Nevels (SBN 302994)
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6 Attorneys for Plaintiffs

7 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO**

8 **CIVIL UNLIMITED DIVISION**

9
10 RUTH JOY SEGOVIA; FARANAK
KIANFAR; DIEMVY PHAM; LISA
11 MATHEWS FITZGIBBONS; CYNTHIA
GUERRERO; and RENE AMEL PERALTA;
12 as individuals, on behalf of others similarly
situated, and on behalf other aggrieved
13 employees pursuant to the California Private
Attorneys General Act,
14
15 Plaintiffs,
16 vs.
17 ARTEMIS HEADLANDS, LLC, a
Delaware corporation; MAURO
18 ORMEDILLA, an individual; and DOES 1
through 25, inclusive,
19
20 Defendants.

) CASE NO. 24CU020914C
)
) **NOTICE OF MOTION AND MOTION**
) **FOR PRELIMINARY APPROVAL OF**
) **CLASS AND PAGA SETTLEMENT**
)
) *Assigned for All Purposes to Dept. C-75*
) *Hon. James Mangione*
)
) Date: January 23, 2026
) Time: 9:00 a.m.
) Dept: C-75

21 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

22 YOU ARE HEREBY NOTIFIED THAT ON January 23, 2026, at 9:00 a.m or shortly
23 thereafter, located at San Diego Superior Court, 330 W Broadway, San Diego, CA 92101, in
24 Department C-75 before the Honorable James Mangione, Plaintiffs RUTH JOY SEGOVIA,
25 FARANAK KIANFAR, DIEMVY PHAM, LISA MATHEWS FITZGIBBONS, CYNTHIA
26 GUERRERO, and RENE AMEL PERALTA (collectively “Plaintiffs”), will apply for an order:

27 (1) preliminarily approving the proposed settlement of this class and PAGA action with
28 Defendant;

**NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS
AND PAGA SETTLEMENT**

1 (2) for settlement purposes only, conditionally certifying the class, which is comprised of
2 “all individuals who are or were employed by Artemis Headlands as non-exempt hourly
3 employees in California during the Class Period”;

4 (3) provisionally appointing Plaintiffs RUTH JOY SEGOVIA, FARANAK KIANFAR,
5 DIEMVY PHAM, LISA MATHEWS FITZGIBBONS, CYNTHIA GUERRERO, and RENE
6 AMEL PERALTA as the Class and PAGA representative;

7 (4) provisionally appointing Brooke B. Nevels and Christopher E. Nichols of NEVELS
8 NICHOLS, LLP, as Class Counsel for the Class;

9 (5) approving the form and method for providing notice to the class and aggrieved
10 employees;

11 (6) directing that notice of the proposed settlement be given to the class and aggrieved
12 employees;

13 (7) appointing ILYM Group, Inc., as the Settlement Administrator;

14 (8) and scheduling a final approval hearing date to consider Plaintiffs’ Motion for Final
15 Approval of the Settlement and entry of the judgment.

16 Plaintiffs and Defendant have reached a full and final settlement of the above-captioned
17 action, which is embodied in the Class Action and PAGA Settlement Agreement (“Agreement”)
18 attached to the Declaration of Brooke B. Nevels (“Decl. Nevels”).

19 This motion for preliminary approval of the class action and PAGA settlement is brought
20 pursuant to California Rules of Court, Rule 3.769. Plaintiffs motion will be based on this Notice,
21 the accompanying memorandum of points and authorities, the Declaration of Brooke B. Nevels,
22 the Declaration of Ruth Joy Segovia, the Declaration of Faranak Kianfar, the Declaration of
23 Diemvy Pham, the Declaration of Lisa Mathews Fitzgibbons, the Declaration of Cynthia
24 Guerrero, the Declaration of Rene Amel Peralta, the Declaration of the settlement administrator,
25 the proposed order, and the complete files and records in this action.

26 This motion will not be opposed by Defendant.
27
28

1 Dated: December 30, 2025

NEVELS NICHOLS, LLP

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3 By Brooke B. Nevels
4 BROOKE B. NEVELS
5 CHRISTOPHER E. NICHOLS
6 Attorneys for Plaintiffs
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PROOF OF SERVICE

I, the undersigned, declare that I am over the age of eighteen years and not a party to the case. My business address is 10650 Treena Street, Suite 212, San Diego, California 92131. On Tuesday, December 30, 2025, I served a copy of the following documents:

- **NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **MEMORANDUM OF POINTS AND AUTHORITIES FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF BROOKE B. NEVELS IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF RUTH JOY SEGOVIA IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF RENE AMEL PERALTA IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF CYNTHIA GUERRERO IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF LISA FITZGIBBONS IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF FARANAK KIANFAR IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF DIEMVY PHAM IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF LISA MULLINS IN SUPPORT OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT**

☒ **By Electronic Service:** Based on a court order, Code of Civil Procedure Section 1010.6 and California Rules of Court Rule 2.251, or an agreement of the parties to accept electronic service. I caused the above documents to be sent to the person(s) at the e-mail address(es) set forth below.

☐ **By Mail:** I placed the envelope for collection and mailing at the address(es) below, following our ordinary business practices. I am readily familiar with this firm's business practice for collecting and processing correspondence for mailing, on the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or

employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Diego, California.

James C. Fessenden
Lauren M. Guggisberg
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Attorneys for Defendants

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on Tuesday, December 30, 2025, at San Diego, California.



RAHA RAZAVI