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Attorneys for Plaintiffs Salvador Rodriguez, German Rodriguez and all other current and former employees similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL DISTRICT**

**SALVADOR RODRIGUEZ, GERMAN
RODRIGUEZ**, on Behalf of Themselves and
All Other Current and Former Employees
Similarly Situated,

Plaintiffs,

v.

WNU LLC DBA PAPA JOHNS, a
Washington Limited Liability Company,
PAUL URBINA, BRISIA OCHOA,
Individuals, and **DOES 1 to 50, Inclusive.**

Defendants.

CASE NO. 23STCV28934

*Assigned for All Purposes to the Honorable
William F. Highberger*

Dept. No. 10

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

Hearing Date: October 28, 2025
Hearing Time: 10:30 AM
Place: Dept. 10
Action Filed: November 22, 2023
Trial Date: Not Set

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1. Conditionally certifying the Class for purposes of settlement;
2. Preliminarily approving the proposed class action settlement between Plaintiffs and Defendants WNU LLC dba Papa Johns, a Washington limited liability company, Paul Urbina, an individual, and Brisia Ochoa, an individual (collectively “Defendants”), as fair adequate, and reasonable, based upon the terms set forth in the Parties’ Settlement and Release Agreement (“Settlement Agreement”), including payment by Defendants of the non-reversionary Gross Settlement Amount (“GSA”) of \$456,000 for the Settlement of “Class,” and the following estimated allocations therefrom:

Litigation Costs (not to exceed) (\$25,000.00)

Service Payment to Class Representative Salvador Rodriguez (\$10,000.00)

PAGA Payment (75% to LWDA) (\$7,500.00)

1 3. Preliminarily appointing Plaintiff Salvador Rodriguez and German Rodriguez
2 as the Class Representatives and Eli M. Kantor as Class Counsel for purposes of settlement;

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4 4. Appointing ILYM as the third-party Settlement Administrator for mailing
5 notices and for settlement administration; and

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7 5. Approving the proposed Class Notice and ordering it be disseminated to the
8 Class as provided in the Settlement Agreement.

9 The motion is based on this Notice, the attached memorandum of points and
10 authorities, the attached declarations, all matters of which this Court may take judicial notice,
11 all pleadings in this matter, and such evidence and argument as may be presented at the
12 hearing or the Court may allow.
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17 Dated: August 7, 2025



ELI M. KANTOR
Attorney for Plaintiffs SALVADOR
RODRIGUEZ, GERMAN RODRIGUEZ
and All Others Similarly Situated