

1 JAMIE SERB (SBN 289601)
jamie@crosnerlegal.com
2 BRANDON BROUILLETTE, ESQ. (SBN 273156)
bbrouillette@crosnerlegal.com
3 ZACHARY M. CROSNER, ESQ. (SBN 272295)
zach@crosnerlegal.com
4 **CROSNER LEGAL, PC**
5 9440 Santa Monica Blvd. Suite 301
6 Beverly Hills, CA 90210
7 Tel: (866) 276-7637
8 Fax: (310) 510-6429

9 Attorneys for Plaintiff CHARMAINE TATE
10 As an individual and on behalf of all others similarly situated

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF EL DORADO**

13 CHARMAINE TATE, as an individual and
14 on behalf of all others similarly situated,

15 Plaintiff,

16 v.

17 PRO ENERGY SERVICES GROUP, LLC,
a Delaware Limited Liability Company;
and DOES 1-100, inclusive,

18 Defendants.
19
20
21
22
23
24
25
26
27
28

Case No.: 23CV0586

Assigned for All Purposes to:
Hon. Gary S. Stossberg
Dept. 9

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND REQUEST FOR
ATTORNEY'S FEES AND COSTS**

Date: February 21, 2025
Time: 8:30 a.m.
Dept. 9

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

2 **PLEASE TAKE NOTICE THAT** that on February 21, 2025, at 8:30 a.m., or as soon
3 thereafter as the matter may be heard, in Department 9 of the above-captioned Court, located at 3321
4 Cameron Park Drive, Cameron Park, California, plaintiffs Charmaine Tate and Dave Crockett, on
5 behalf of themselves and the conditionally certified settlement class, will and hereby do move the
6 Court for an order granting final approval of the proposed class action settlement, approving the
7 payment of civil penalties, approving the class representative service payments provided for the
8 class action settlement, and approving payment of the Settlement Administrator's fees and expenses.
9 Plaintiffs also will and hereby do move the Court for an order granting an award of attorney's fees
10 in the amount of \$300,000 (1/3 of the gross settlement amount) and costs in the amount of \$15,000,
11 as provided in the proposed class action settlement.

12 This motion is brought under California Rule of Court 3.769, on the grounds that the
13 settlement is fair, reasonable and adequate and in the best interests of the class, and meets all
14 requirements for class certification. The requested class representative service payments are fair and
15 reasonable under the circumstances of the case. The requested attorney's fees and costs are fair and
16 reasonable under the circumstances of the case.

17 This motion will be based on this Notice of Motion and Motion, the accompanying
18 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying Declarations
19 of Brandon Brouillette, Larry Lee, Simon Yang, and Mayra Gonzalez, the Court's entire file herein,
20 and on such further evidence and argument as may be presented at the hearing.

21
22 Dated: January 28, 2025

CROSNER LEGAL, PC

23
24 By: 

25 Jamie Serb, Esq.
26 Brandon Brouillette, Esq.
27 Zachary M. Crosner, Esq.
28 Attorneys for Plaintiff
CHARMAINE TATE