

TOREY JOSEPH FAVAROTE (SBN: 198521)
DAVID H. DANNING (SBN: 354477)
GLEASON & FAVAROTE LLP
3646 Long Beach Blvd., Suite 203
Long Beach, California 90807
Telephone: (213) 452-0510
Facsimile: (213) 452-0514
tfavarote@gleasonfavarote.com
ddanning@gleasonfavarote.com

Attorneys for Plaintiff Maria Reyes on behalf
of all aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

MARIA REYES, on behalf of all aggrieved
employees,

Plaintiff,

vs.

LYNEER STAFFING SOLUTIONS, LLC, a
Delaware Limited Liability Corporation; and
DOES 1-40, inclusive,

Defendants.

) Case No. CIVSB2317672
)

) **PLAINTIFF'S AMENDED NOTICE OF**
) **MOTION FOR APPROVAL OF PAGA**
) **ACTION SETTLEMENT;**
) **APPOINTMENT OF SETTLEMENT**
) **ADMINISTRATOR; APPROVAL OF**
) **PAGA NOTICE; APPROVAL OF**
) **ENHANCEMENT AWARD; AND**
) **APPROVAL OF ATTORNEYS' FEES**
) **AND COSTS**

) Date: April 22, 2026
) Time: 8:30 a.m.
) Judge: Hon. Stephanie Tanada
) Dept.: S33
)

) Action Filed: August 1, 2023
) Trial Date: None
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**PLAINTIFF'S AMENDED NOTICE OF MOTION FOR APPROVAL OF PAGA ACTION SETTLEMENT;
APPOINTMENT OF SETTLEMENT ADMINISTRATOR; APPROVAL OF PAGA NOTICE; APPROVAL
OF ENHANCEMENT AWARD; AND APPROVAL OF ATTORNEYS' FEES AND COSTS**

1 **TO THE CLERK OF THE COURT AND ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE** that on April 22, 2026, at 8:30 a.m., or as soon thereafter as the
3 matter may be heard, in Department S-33 of this Court, located at 247 West 3rd St. San
4 Bernardino, CA 92415, before the Honorable Stephanie Tanada, plaintiff Maria Reyes ("Plaintiff")
5 on behalf of the State of California and the aggrieved employees in this matter, will and hereby
6 does move the Court for approval of this PAGA action settlement; appointment of Apex Class
7 Action LLC as settlement administrator; approval of the settlement notice; approval of Plaintiff's
8 enhancement award; and approval of attorneys' fees and costs.

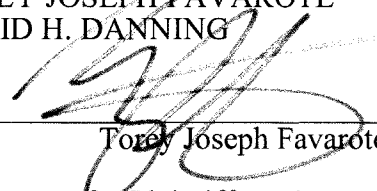
9 This motion is made on the grounds that the parties have reached a fair and reasonable
10 settlement of the PAGA claim that will deliver substantial value to the aggrieved employees and
11 the Labor and Workforce Development Agency (the "LWDA"), and the settlement is deserving of
12 approval by this Court.

13 In connection with this motion, Plaintiff has given notice to the LWDA of the settlement
14 and this motion pursuant to California Labor Code section 2699(l)(2) by providing all of the
15 associated papers and the Settlement Agreement to the LWDA.

16 This motion is based upon this notice; the accompanying Memorandum in Support of
17 Motion for Approval of PAGA Action Settlement; Declaration of Maria Reyes in Support;
18 Declaration of Torey Joseph Favarote in Support; the Declaration of Expert James Toney,
19 [Proposed] Order; the Court's record of this action; all matters of which the Court may take notice;
20 and such oral and documentary evidence received by the Court at the hearing on the motion.

21 Dated: March 30, 2026

22 GLEASON & FAVAROTE LLP
23 TOREY JOSEPH FAVAROTE
24 DAVID H. DANNING

25 
26 Torey Joseph Favarote

27 Attorneys for Plaintiff Maria Reyes on
28 behalf of all aggrieved employees

PROOF OF SERVICE

I, Thomas Steinhart, declare:

I am and was at the time of the service mentioned in this declaration, employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is Gleason & Favarote, LLP, 3646 Long Beach Blvd., Suite 203, Long Beach, CA 90807.

On March 30, 2026, I served a copy(ies) of the following document(s):

PLAINTIFF'S AMENDED NOTICE OF MOTION FOR APPROVAL OF PAGA ACTION SETTLEMENT; APPOINTMENT OF SETTLEMENT ADMINISTRATOR; APPROVAL OF PAGA NOTICE; APPROVAL OF ENHANCEMENT AWARD; AND APPROVAL OF ATTORNEYS' FEES AND COSTS

on the parties to this action as follows:

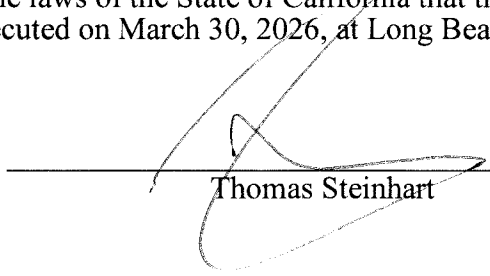
Attorney	Party(ies) Served	Method of Service
Stacey M. Cooper, Esq. STACEY COOPER LAW, PC 888 Prospect Street, Suite 200 La Jolla, CA 92037 Phone: 619-673-5022 stacey@cooperlawpc.com corbyns@cooperlawpc.com sandra@cooperlawpc.com	Lyneer Staffing Solutions, LLC	By Hand and One Legal, LLC

☐ [BY OVERNIGHT COURIER] I caused the sealed envelope(s) to be delivered by a commercial courier service for overnight delivery to the offices of the addressee(s).

☒ [BY HAND] I directed the sealed envelope(s) to the party(ies) so designated on the service list to be delivered by Ace Attorney Service, Inc. this date.

☒ [BY DESIGNATED ELECTRONIC FILING SERVICE] I hereby certify that the above-referenced document(s) were served electronically on the parties listed herein at their most recent known email address or email of record by submitting an electronic version of the document(s) to One Legal, LLC, through the user interface at www.onelegal.com.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that this declaration was executed on March 30, 2026, at Long Beach, California.


Thomas Steinhart