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Attorney for Plaintiffs & Putative Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KINGS
(UNLIMITED JURISDICTION)**

DAMIAN LONA, ABELARDO LEDESMA,
AND FRANCISCO MENDOZA on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

LANGSTRAAT FARMS, INC., a California
Corporation; LANGSTRAAT HARVESTING,
INC., a California Corporation; JASON E.
LANGSTRAAT, individually; DENNIS H.
LANGSTRAAT, individually; and, DOES 1
through 50, inclusive,

Defendants.

Case No. 25CU0117

*Assigned for all purposes to: Hon. Jennifer
Giuliani in Dept. 1*

**NOTICE OF MOTION AND MOTION FOR
(1) PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT; (2)
PROVISIONAL CERTIFICATION OF
CLASS AND APPOINTMENT OF CLASS
COUNSEL; (3) APPROVAL OF FORM AND
METHOD OF CLASS NOTICE; AND (4)
THE SCHEDULING OF A FINAL
FAIRNESS HEARING**

Date: March 2, 2026

Time: 08:15 a.m.

Dept: 1

NOTICE

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS
OF RECORD:**

PLEASE TAKE NOTICE that on March 2, 2026, at 08:15 a.m., or as soon thereafter as the
matter may be heard in Department 1 of the above-entitled Court located at 1640 Kings County
Drive, Hanford, CA 93230, Plaintiffs Damian Lona, Abelardo Ledesma and Francisco Mendoza

1 (“Named Plaintiffs”), individually and on behalf of all similarly situated individuals, will and hereby
2 do move this Court for entry of the proposed Order filed concurrently herewith:

3 1. Preliminary approving the class action settlement for Two Hundred Thousand Dollars
4 (\$200,000) as presumptively fair, adequate, and reasonable;

5 2. Conditionally certifying the class for proposed settlement, appointing the Named
6 Plaintiffs as the class representatives, and appointing the Law Office of Enrique Martinez, PC as
7 class counsel;

8 3. Approving the proposed form and method of class notice; and,

9 4. Scheduling a fairness hearing on the question of whether the proposed settlement
10 should be finally approved as fair, reasonable, and adequate.

11 The grounds for this motion are that (1) the parties have reached an arms-length settlement
12 of this matter after bona fide settlement negotiations including a mediation session with an
13 experienced mediator; (2) Plaintiffs’ counsel and the Named Plaintiffs, as representatives of the class,
14 believe that the proposed settlement is in the best interests of the class as a whole; and (3) all parties
15 desire to conclude this matter without further expense, delay, and uncertainty. This Motion is based
16 on the accompanying Memorandum of Points and Authorities, the Declaration of Enrique Martinez,
17 the Proposed Order, and all other records, pleadings, and papers filed in this action.

18 Date: February 13, 2026

Respectfully Submitted,

LAW OFFICE OF ENRIQUE MARTINEZ, PC

21 By: *Enrique Martinez*
22 Enrique Martínez
23 *Attorney for Plaintiffs & Putative Class*