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Attorneys for Plaintiff MONICA M. VALENCIA,
on behalf of herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MONICA M. VALENCIA, an individual, on behalf of herself and others similarly situated,

Plaintiff,

vs.

YOUNG WOMEN'S CHRISTIAN ASSOCIATION OF GREATER LOS ANGELES, CALIFORNIA, a California Nonprofit Corporation; and DOES 1 through 50, inclusive,

Defendants.

CLASS ACTION

Case No. 25STCV32142

Honorable Elaine Lu
Dept.: 9

PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR AN ORDER (1) PRELIMINARILY APPROVING THE CLASS ACTION SETTLEMENT; (2) APPROVING NOTICE OF CLASS ACTION SETTLEMENT; AND (3) SETTING HEARING FOR FINAL APPROVAL

[filed concurrently with Plaintiff's Memorandum of Points and Authorities; Declaration of Marta Manus; Declaration of Monica M. Valencia, Declaration of Lisa Mullis; and [Proposed] Order]

Date: December 22, 2026
Time: 8:30 a.m.
Dept.: 9

Complaint Filed: November 3, 2025
First Amended Complaint: January 7, 2026
Trial Date: None Set

TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 22, 2026, at 8:30 a.m., or as soon thereafter as this matter may be heard in Department 9 of the Los Angeles County Superior Court, located at 312 N Spring Street, Los Angeles, California 90012, Plaintiff Monica M. Valencia ("Plaintiff"), on behalf of herself and all persons similarly situated, will and hereby moves this Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order:

(1) Preliminarily approving the class action settlement reached between Plaintiff and Defendant Young Women's Christian Association of Greater Los Angeles, California ("Defendant" collectively with Plaintiff, "the Parties"), including granting preliminary approval of the following Class: all individuals who are or previously were employed by Defendant and were employed as non-exempt employees in the State of California from November 3, 2021, through September 15, 2026 or 24,074 workweeks, whichever is less;

(2) Approving the form of Class Notice and procedure for notice to the class; and

(3) Setting the final approval hearing.

Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed settlement's allocation of funds to claims made under the Labor Code Private Attorneys General Act of 2004 ("PAGA").

Pursuant to the proposed Class Action and PAGA Settlement Agreement ("Settlement" or "Settlement Agreement"), filed concurrently herewith, Defendant does not oppose the preliminary approval of the class action settlement.

Under the terms of the Settlement, the Parties have agreed that all claims brought on behalf of the Class Members shall be fully and finally resolved for the total sum of $427,000.00 ("Gross Settlement Amount") to be paid on a non-reversionary basis. The amount remaining of the Gross Settlement Amount after the following deductions have been made ("Net Settlement Amount") shall be available for distribution to Class Members who do not opt out of the settlement:

- not more than Five Thousand Dollars ($5,000.00) to the Class Representative for a Service Payment;
- not more than One Hundred Forty Thousand Nine Hundresd Ten Dollars and Zero Cents ($140,910.00) to Class Counsel for attorneys' fees, and no more than Twelve Thousand Dollars ($12,000.000) for Class Counsel Litigation Expenses;
- up to $7,850.00 for the Administrator Expenses; and,
- $42,700 for civil penalties under the PAGA, where 65% ($27,755) will be paid to the LWDA and 35% ($14,945) will be distributed to Aggrieved Employees).

This Notice of Motion and Motion is based on the fact that this is a fair and reasonable settlement that benefits the class and was the product of informed, non-collusive negotiations by the parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44. The proposed settlement meets the legal standard for preliminary approval and is in the best interests of the class; the proposed form of notice explains the settlement terms in a clear and straightforward manner; the proposed procedures for notice provide the best practical notice to the class; and that Class Members will have an opportunity to participate in and/or object to the settlement and/or opt-out of the settlement.

This Notice of Motion and Motion is based on this Notice, and the exhibits thereto (including the Notice to Class Members), the accompanying Memorandum of Points and Authorities, the Declaration of Marta Manus and exhibits thereto, the Declaration of Monica M. Valencia, the Declaration of Lisa Mullins the pleadings, records and files in the case, and such other further oral and documentary evidence which may be submitted at or before the hearing on this Motion.

Dated: November 5, 2026

D.LAW, INC.

By _____
Marta Manus
Attorneys for Plaintiff, Monica M. Valencia, on behalf of herself and others similarly situated