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TENTATIVE RULINGS will be
available beginning at 1:30PM
on the court day preceding the
scheduled hearing
at www.cc-courts.org

[additional counsel listed on signature page]

*Attorneys for Plaintiffs, the Proposed
California Class, and Aggrieved Employees*

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF CONTRA COSTA**

GEROSKA GAY, PATRICIA YOUNG,
PHILIP JACKSON, and VANESSA
MARTINEZ, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

PREMIUM RETAIL SERVICES, LLC, a
Delaware limited liability company;
PREMIUM RETAIL SERVICES, INC., a
Delaware corporation; EZAT RAHIMI, an
individual; and DOES 1 through 100,
inclusive,

Defendants.

: Case No.: C23-2216
:
: **PLAINTIFFS' NOTICE OF**
: **UNOPPOSED MOTION FOR FINAL**
: **APPROVAL OF CLASS AND**
: **REPRESENTATIVE ACTION**
: **SETTLEMENT**

:
: Action Filed: September 5, 2023
: Trial Date: None set
:
: Hearing Date: July 22, 2026
: Time: 9:00 a.m.
: Dept.: 16
: Judge: Hon. Benjamin T. Reyes, II

**NOTICE OF UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on July 22, 2026 at 9:00 a.m. or as soon thereafter as they may be heard in Department 16 of the Superior Court of the State of California for the County of Contra Costa, Plaintiffs Geroska Gay, Patricia Young, Philip Jackson, and Vanessa Martinez (together collectively, “Plaintiffs”) on behalf of themselves and all others similarly situated and aggrieved, will and hereby do move for this Court for entry of an Order:

1. Finally approving the settlement set forth in the Class and Representative Action Settlement and Release (the “Settlement Agreement”), as fair, reasonable and adequate pursuant to Code of Civil Procedure Section 382;

2. Finally approving payment of the Gross Settlement Amount of \$3,000,000.00;

3. Finally approving PAGA Penalties as fair, reasonable, and adequate in the amount of \$150,000.00, seventy-five percent (75%), or \$112,500.00, of which will be paid to the Labor and Workforce Development Agency out of the Gross Settlement Amount, and twenty-five percent (25%), or \$37,500.00, of which will be distributed to Aggrieved Employees;

4. Finally approving attorneys’ fees in the amount of \$1,000,000.00 and litigation expenses not to exceed \$65,000¹;

5. Finally approving Class Representative Service Payments in the amount of \$10,000.00 to each Named Plaintiff, for a total of \$40,000.00;

6. Finally approving Settlement Administration Costs in the amount of \$34,990.00 to Apex Class Action (“Apex” or “Settlement Administrator”) for costs incurred in administering the Settlement, including distribution of the Class Notice, as set forth in the Settlement Agreement;

7. Finally certifying the Class Members defined as Plaintiffs and all non-exempt, hourly employees who fall under Defendant’s Representative job classification in California from June 13,

¹ The Parties will request a compliance hearing to take place within thirty (30) days following the conclusion of the settlement administration process, and Class Counsel shall submit a compliance statement one (1) week before the Compliance Hearing Date. The Settlement Administrator shall retain five percent (5%) of Class Counsel’s attorneys’ fee award pending outcome of the Compliance Hearing.

1 2022, through September 26, 2024, pursuant to Code of Civil Procedure Section 382 for the purpose
2 of settlement only;

3 8. Finally approving the Plaintiffs as Class Representatives of the Class Members;

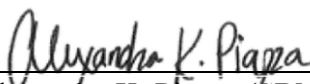
4 9. Finally approving Alexandra K. Piazza of Berger Montague PC; David D. Bibiyan and
5 Vedang J. Patel of Bibiyan Law Group, P.C.; and Roman Shkodnik of D. Law, Inc. as Class Counsel
6 for the Class Members;

7 10. Entering an order finally approving the Settlement consistent with the terms of the
8 Settlement Agreement and dismissing the Action.

9 This Motion will be based on this Notice of Motion, the Memorandum of Points and
10 Authorities filed herewith, the Declarations of Alexandra K. Piazza, David D. Bibiyan, Enoch J. Kim,
11 and Madely Nava of Apex Class Action, LLC, and exhibits attached thereto, argument of counsel and
12 upon such other material contained in the file and pleadings of this action. The Motion is unopposed,
13 as Defendant does not oppose the relief requested.

14 Dated: June 25, 2026

Respectfully submitted,

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