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Attorneys for Plaintiffs

[additional counsel on the following page]

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

DEANDRE PIERCE, on behalf of himself,
all others similarly situated, and on behalf
of the general public,

Plaintiffs,

v.

QUALITY DRIVE AWAY, INC.; and
DOES 1-100,

Defendants.

DEON GENTRY and DEON GENTRY,
JR., as individuals and on behalf of all
other Aggrieved Employees,

Plaintiffs,

v.

QUALITY DRIVE AWAY, INC., an
Indiana corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. CIVSB2313410

[Consolidated with Case No. CIVSB2322025]

[Assigned for all purposes to Hon. Joseph T.
Ortiz, Dept. S17]

**NOTICE OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT, CONDITIONAL
CERTIFICATION, APPROVAL OF
CLASS NOTICE, SETTING OF FINAL
APPROVAL HEARING DATE**

Judge: Honorable Joseph T. Ortiz

Dept: S17

Date: August 11, 2026

Time: 1:30 p.m.

1 **HAINES LAW GROUP, APC**
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2 El Segundo, California 90245
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4 Attorneys for Plaintiffs
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1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on August 11, 2026 at 1:30 p.m., or as soon thereafter as
3 the matter can be heard, in Department S17 of the San Bernardino County Superior Court, located
4 at 247 West Third Street, San Bernardino, CA 92415, before the Honorable Joseph T. Ortiz,
5 Plaintiffs Deandre Pierce and Deon Gentry Jr. will move the Court for Preliminary Approval of
6 Class Action Settlement; Conditional Certification; Approval of Class Notice; and Setting of Final
7 Approval Hearing Date.

8 This motion will be based on this Notice, the Memorandum of Points and Authorities, the
9 Declaration of David Mara, Esq., the Declaration of Scott Lidman, Esq., the Declaration of Paul
10 Haines, Esq., the Declaration of Milan Moore, the Declaration of Tiara Gose-Hardy, the
11 Declaration of Plaintiff Deandre Pierce, the Declaration of Deon Gentry Jr., any and all documents
12 filed in this matter, and any argument that may be presented at the hearing, and upon such other
13 matters as this Court may consider.

14
15 Dated: July 15, 2026

MARA LAW FIRM, PC

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18 /s/ Carter Cordura

David Mara, Esq.

Jill Vecchi, Esq.

Carter Cordura, Esq.

Attorneys for Plaintiff
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