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7 Attorneys for Plaintiff PATRICIA ALVARADO as an individual and on
behalf of all others similarly situated.

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN BERNADINO**

11 PATRICIA ALVARADO, as an individual
12 and on behalf of all others similarly
13 situated,

14 Plaintiff,

15 vs.

16 JC-4, INC., a California Corporation; and
17 DOES 1-100, inclusive,

18 Defendants.

Case No. CIVSB2314091

Assigned for all Purposes to the:
Hon. Joseph T. Ortiz
Dept. S-17

**NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: April 24, 2025
Time: 1:30 p.m.
Dept.: S17

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT on April 24, 2025, at 8:30 a.m., or as soon thereafter as
3 the matter may be heard, in Department S26 of the above-entitled Court, located at 247 West
4 Third St., San Bernardino, California, Plaintiff Patricia Alvarado will move the Court for
5 preliminary approval of a proposed class action settlement in the above-captioned action under
6 Cal. Rule of Court 3.769. The terms of the settlement are contained within the Class Action and
7 PAGA Settlement Agreement (the "Settlement Agreement"), filed concurrently herewith as
8 Exhibit 1 to the Declaration of Brandon Brouillette. In addition, Plaintiff requests that the Court
9 certify the class described in the Settlement Agreement; approve the form of class notice attached
10 as Exhibit A to the Settlement Agreement; approve Crosner Legal, P.C. as Class Counsel and
11 plaintiff Patricia Alvarado as the Class Representative, approve Phoenix Settlement
12 Administrators as the Settlement Administrator, and set a final approval hearing for September
13 25, 2025, or the first available date on the Court's calendar thereafter.

14 The motion will be based upon this notice of motion and motion, the accompanying
15 memorandum of points and authorities, declarations of Brandon Brouillette, Patricia Alvarado,
16 and Jodey Lawrence, the Settlement Agreement, the Court's entire file herein, and on such other
17 argument and evidence as the Court may entertain at the hearing on this motion.

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19 Dated: March 18, 2025

CROSNER LEGAL, P.C.

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21 By: 
22 Brandon Brouillette
23 Attorneys for Plaintiff Patricia Alvarado
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