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Attorneys for Plaintiffs Garrett Lee Schuck and Brittney Ewing, individually, and on behalf of all others similarly situated.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN JOAQUIN

GARRETT LEE SCHUCK, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

TW SERVICES, INC.; and DOES 1 through 20, inclusive,

Defendants.

Case No. STK-CV-UOE-2023-0006580

*Assigned for All Purposes to:
Judge Jayne Lee,
Dept. 10C*

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Date: March 13, 2025; March 18,
2025; March 19, 2025; March
20, 2025; or March 21, 2025
Time: 9:00 a.m.
Dept: 10C

**TO THE COURT, ALL INTERESTED PARTIES, AND THEIR RESPECTIVE ATTORNEYS
OF RECORD:**

PLEASE TAKE NOTICE that on the following proposed dates of March 13, 2025; March 18, 2025; March 19, 2025; March 20, 2025; or March 21, 2025 at 9:00 a.m., or as soon thereafter as the matter may be heard in Department 10C of the above-entitled Court located at 180 E Weber Avenue Stockton, CA 95202, Plaintiffs Garrett Lee Schuck and Brittney Ewing (“Plaintiffs”) will and hereby do move this Court for an Order:

1. Granting preliminary approval of the proposed CLASS ACTION AND PAGA SETTLEMENT AGREEMENT AND CLASS NOTICE (“Settlement Agreement” or “Agreement”);
2. Conditionally certifying the proposed Class for settlement purposes only;
3. Appointing Plaintiffs Garrett Lee Schuck and Brittney Ewing as the Class Representatives;
4. Appointing Aegis Law Firm, PC and Bibiyan Law Group, P.C. as Class Counsel;
5. Appointing Phoenix Settlement Administrators as the Settlement Administrator and authorizing Phoenix Settlement Administrators to send notice of the Settlement to the Class Members; and
6. Setting a final approval hearing date.

Pursuant to California Rules of Court 3.769(d) and (e), the Motion is made on the grounds that the proposed Settlement Agreement satisfies all criteria for preliminary approval under California law and falls well within the range of reasonableness; the Agreement was reached through informed, arms-length bargaining between experienced attorneys, and Plaintiff and Class Counsel will fairly and adequately represent the Class Members.

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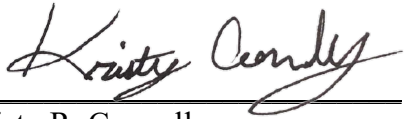
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1 The Motion is based on this Notice of Motion, Plaintiffs' Memorandum of Points and
2 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement, the Declaration
3 of Kristy R. Connolly, the Declaration of David Bibiyan, and on all records and documents on file,
4 together with such oral and documentary evidence that may be presented at the hearing on this matter.

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6 Dated: February 13, 2025

AEGIS LAW FIRM, PC

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8 By: 
9 Kristy R. Connolly
Attorneys for Plaintiffs