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13 individually and on behalf of all others similarly situated
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16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **FOR THE COUNTY OF STANISLAUS**
18

19 JERMAINE LEE KEYS, individually and on
20 behalf of all others similarly situated,

21 Plaintiff,

22 vs.

23 FLORY INDUSTRIES; and DOES 1 through
24 20, inclusive,

25 Defendants.
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27
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Case No. CV-23-003252

Assigned for All Purposes to:
Judge Sonny Sandhu
Dept. 24

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

Date: June 11, 2025
Time: 8:30 a.m.
Dept: 24

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

3 PLEASE TAKE NOTICE that on June 11, 2025 at 8:30 a.m., or as soon thereafter as the matter
4 may be heard in Department 24 of the above-entitled Court located at 801 10TH Street, Modesto, CA
5 95354, Plaintiff Jermaine Lee Keys (“Plaintiff”) will and hereby does move this Court for an Order:

- 6 1. Granting preliminary approval of the proposed CLASS ACTION AND PAGA
7 SETTLEMENT AGREEMENT AND CLASS NOTICE (“Settlement Agreement” or
8 “Agreement”);
- 9 2. Conditionally certifying the proposed Class for settlement purposes only;
- 10 3. Appointing Plaintiff Jermaine Lee Keys as the Class Representative;
- 11 4. Appointing Aegis Law Firm, PC as Class Counsel;
- 12 5. Appointing ILYM Group, Inc. as the Settlement Administrator and authorizing ILYM
13 Group, Inc. to send notice of the Settlement to the Class Members; and
- 14 6. Setting a final approval hearing date.

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

20 The Motion is based on this Notice of Motion, Plaintiff’s Memorandum of Points and
21 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement, the Declaration
22 of Julia M. Toscano, and on all records and documents on file, together with such oral and documentary
23 evidence that may be presented at the hearing on this matter.

24 Dated: April 3, 2025

AEGIS LAW FIRM, PC

25
26 By: 

27 Julia M. Toscano
28 Attorneys for Plaintiff