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Attorneys for Plaintiff LLEWELLYN MCCRAY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

EDUARDO GOMEZ FAUSTO and
LLEWELLYN MCCRAY, on behalf of the
State of California, and others similarly
situated and aggrieved,

Plaintiffs,

v.

EAST COAST/WEST COAST LOGISTICS,
LLC, a Delaware Limited Liability Company;
NEED IT NOW DELIVERY, INC., a New
York Corporation; CONSOLIDATED
STAFFING SOLUTIONS, INC., a California
Corporation; WORKFORCE ENTERPRISES
WFE, INC., a California Corporation; VENUS
STAFFING, INC.; PARTNERS
PERSONNEL – MANAGEMENT
SERVICES, LLC; HR DIRECT SERVICES
INC., a California Corporation; HR DIRECT
SERVICES LLC, a California Limited
Liability Company; THE GHR COMPANY

Case No. CIVSB2322813

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF SETTLEMENT
UNDER PRIVATE ATTORNEYS
GENERAL ACT**

Date: March 26, 2026

Time: 8:30 a.m.

Dept.: S35

Complaint Filed: September 19, 2023

Trial Date: None Set

1 LLC, a California Limited Liability Company;
2 THE GHR MANAGEMENT COMPANY
3 INC., a California Corporation; and DOES 1-
4 100, inclusive,

5 Defendants.

6 EAST COAST/WEST COAST LOGISTICS,
7 LLC, a Delaware Limited Liability Company,

8 Cross-Complainant,

9 v.

10 CONSOLIDATED STAFFING SOLUTIONS,
11 INC., a California Corporation; WORKFORCE
12 ENTERPRISES WFE, INC., a California
13 Corporation; HR DIRECT SERVICES INC;
14 VENUS STAFFING, INC., PARTNERS
15 PERSONNEL – MANAGEMENT SERVICES,
16 LLC and ROES 1 through 50, inclusive,

17 Cross-Defendants.

TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on March 26, 2026 at 8:30 a.m., in Department S35 of the San Bernardino County Superior Court, located at 247 West Third Street, San Bernardino, California, Plaintiffs Eduardo Gomez Fausto and Llewellyn McCray, on behalf of themselves and the State of California by and through the Labor Workforce & Development Agency, will and hereby do move the Court for an order granting approval of the proposed settlement under the Private Attorneys General Act, Labor Code sections 2698, *et seq.*, approving the payment of civil penalties to the State and the Aggrieved Employees, approving Atticus Administration, LLC as the Settlement Administrator and payment of its fees in the amount up to \$17,000.00, and approving payment of Plaintiffs' counsels' attorney's fees in the amount of \$346,843.33 and costs in the amount of \$18,724.56.

This motion is brought under Labor Code section 2699(l)(2), and on the grounds that the settlement is fair, reasonable and adequate and meets all requirements for approval under PAGA, and the requested attorney's fees and costs are fair and reasonable under the circumstances of the case.

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1 This motion is based upon this Notice of Motion and Motion, the accompanying
2 memorandum of points and authorities, the accompanying declarations of Nikki Trenner, Harut
3 Voskanyan, Christopher Longley, Eduardo Gomez Fausto, and , the Joint Llewellyn McCray, the
4 Memorandum of Understanding – Settlement Terms submitted herewith, the Court’s entire file in
5 this matter, and on such other argument and evidence as may be presented at or before the hearing
6 in this matter.

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9 Dated: January 23, 2026

Respectfully Submitted,

CROSNER LEGAL, P.C.

VOSKANYAN LAW FIRM, P.C.

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Zachary Crosner

Jamie Serb

Nikki Trenner

Harut Voskanyan

Attorneys for Plaintiff EDUARDO GOMEZ

FAUSTO and LLEWELLYN MCCRAY