

**D.LAW, INC.**

Emil Davtyan (SBN 299363)  
emil@d.law  
David Yeremian (SBN 226337)  
d.yeremian@d.law  
Roman Shkodnik (SBN 285152)  
r.shkodnik@d.law  
Enoch J. Kim (SBN 261146)  
e.kim@d.law  
Norayr Zakaryan (SBN 356913)  
n.zakaryan@d.law  
450 N Brand Blvd, Suite 840  
Glendale, CA 91203  
Telephone: (818) 962- 6465  
Facsimile: (818) 962-6469

Attorneys for Plaintiff STANLEY CAJIGAL,  
on behalf of himself and all others similarly situated

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

STANLEY CAJIGAL, on behalf of  
himself and others similarly situated,

Plaintiff,

v.

HOWMET GLOBAL FASTERNING  
SYSTEMS INC. dba HOWMET  
GLOBAL FASTENING SYSTEM, a  
Delaware corporation; HOWMET USA  
CORP., an entity of unknown form;  
ALCOA FASTENING SYSTEMS, an  
entity of unknown form; and DOES 1  
through 50, inclusive,

Defendants.

Case No.: CIVSB2316824

CLASS ACTION

Assigned for All Purposes To:  
Hon. Tony Raphael  
Dept.: S36

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

*[Filed concurrently with Memorandum of Points  
and Authorities; Declaration of Enoch J. Kim;  
Declaration of Stanley Cajigal; Declaration of  
Jodey Lawrence; and [Proposed] Order]*

Date: July 1, 2025  
Time: 8:30 a.m.  
Dept.: S36

Original Complaint Filed: July 21, 2023  
First Amended Complaint Filed: September 25,  
2023  
Trial Date: None Set

**TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:**

1 PLEASE TAKE NOTICE that on July 1, 2025, at 8:30 a.m. in Department S36 of the  
2 Courthouse of the San Bernardino Superior Court located at 247 West 3rd Street, San Bernardino,  
3 CA 92415, Plaintiff Stanley Cajigal (“Plaintiff”), on behalf of himself and other similarly situated  
4 employees of defendants Howmet Global Fastening Systems Inc. dba Howmet Global Fastening  
5 System and Defendant Alcoa Fastening Systems (collectively “Defendants,” Defendants and  
6 Plaintiff hereinafter collectively referred to as the “Parties”), will and hereby do move this Court  
7 pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an  
8 order as proposed:

- 9 (1) Preliminarily approving the class action settlement reached between Plaintiff and  
10 Defendants embodied in the Class Action and PAGA Settlement Agreement  
11 (“Settlement” or “Settlement Agreement”), including granting preliminary approval of  
12 the following class: “all persons employed by Defendants in California and classified  
13 as non-exempt hourly employee who worked for Defendants during the Class Period,”  
14 which is from June 1, 2022 through August 2, 2024.
- 15 (2) Finding the settlement reached between the Parties as fair, adequate and reasonable,  
16 and in the best interests of the class members.
- 17 (3) Approving the form of Notice of Class Action Settlement and procedure for notice to  
18 the class.
- 19 (4) Appointing Phoenix Class Action Administration Solutions (“Phoenix”) to perform  
20 the duties of a Settlement Administrator for the purpose of issue the Class Notice and  
21 administering the Settlement; and
- 22 (5) Setting the final approval hearing.

23 Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed  
24 Settlement’s allocation of funds to claims made under the Labor Code Private Attorneys General  
25 Act of 2004 (“PAGA”).

26 This Notice of Motion and Motion is based on the fact that this is a fair and reasonable  
27 settlement that benefits the class and was the product of informed, non-collusive negotiations by  
28 the parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.*

1 (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44.

2 The proposed settlement meets the legal standard for preliminary approval and is in the best  
3 interests of the class; the proposed form of notice explains the settlement terms in a clear and  
4 straightforward manner; the proposed procedures for notice provide the best practical notice to  
5 the class; and that Class Members will have an opportunity to participate in and/or object to the  
6 settlement and/or opt-out of the settlement. Defendants do not oppose this Motion.

7 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto  
8 (including the Notice to Class Members), the accompanying Memorandum of Points and  
9 Authorities, the Declaration of Enoch J. Kim, the Declaration of Stanley Cajigal, the Declaration  
10 of Jodey Lawrence, the pleadings, records and files in the case, and such other further oral and  
11 documentary evidence which may be submitted at or before the hearing on this Motion.

12  
13  
14 Dated: April 23, 2025

Respectfully submitted,

15 D.LAW, INC.

16  
17 By /s/ Enoch J. Kim

18 Emil Davtyan  
19 David Yeremian  
20 Roman Shkodnik  
21 Enoch J. Kim  
22 Norayr Zakaryan  
23 Attorneys for Plaintiff on behalf of himself  
24 and others similarly situated  
25  
26  
27  
28