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Attorneys for Plaintiff JENNIFER REYES,
on behalf of herself and others similarly situated

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

JENNIFER REYES, on behalf of herself and
others similarly situated,

vs.

RESONETICS, LLC, a Delaware limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 37-2023-00041280-CU-OE-CTL

Judge: Hon. Joel R Wohlfeil

Department: C-73

CLASS ACTION

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR AN ORDER (1)
PRELIMINARILY APPROVING THE
CLASS ACTION SETTLEMENT; (2)
APPROVING NOTICE OF CLASS ACTION
SETTLEMENT; AND (3) SETTING
HEARING FOR FINAL APPROVAL**

*[filed concurrently with Plaintiff's Memorandum
of Points and Authorities; Declaration of Enoch
J. Kim; Declaration of Kimberly Sutherland;
Declaration of Jennifer Reyes; and [Proposed]
Order]*

Date: August 1, 2025

Time: 9:00 a.m.

Dept.: C-73

1 **TO THE COURT AND DEFENDANTS AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on August 1, 2025 at 9:00 a.m., or as soon thereafter as this
3 matter may be heard, at Department C-73, located at the Hall of Justice, 330 W. Broadway, San
4 Diego, California, 92101, Plaintiff Jennifer Reyes (“Plaintiff”), on behalf of herself and all
5 persons similarly situated, will and hereby moves this Court pursuant to California Code of Civil
6 Procedure § 382 and California Rule of Court 3.769 for an order:

- 7 (1) Preliminarily approving the class action settlement reached between Plaintiff and
8 Defendant Resonetics, LLC (“Defendant” and collectively with Plaintiff, “the Parties”
9 which is embodied in the Parties’ Class Action and PAGA Settlement Agreement
10 (“Settlement” or “Settlement Agreement”), including granting preliminary approval of
11 the following class: all persons employed by Defendant in California and classified as
12 non-exempt hourly employee who worked for Defendant during the Class Period
13 (“Class” or “Class Members”). The Class Period is the period from July 19, 2019
14 through July 21, 2024;
- 15 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
16 the Class; and
- 17 (3) Setting the final approval hearing.

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

21 This Notice of Motion and Motion is based on the fact that this is a fair and reasonable
22 settlement that benefits the Class and was the product of informed, non-collusive negotiations by
23 the Parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.*
24 (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44.
25 The proposed Settlement meets the legal standard for preliminary approval and is in the best
26 interests of the Class; the proposed form of notice explains the settlement terms in a clear and
27 straightforward manner; the proposed procedures for notice provide the best practical notice to
28 the Class; and that Class Members will have an opportunity to participate in and/or object to the

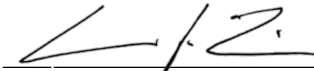
1 Settlement and/or opt-out of the Settlement. Defendant does not oppose this Motion.

2 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto
3 (including the Notice to Class Members), the accompanying Memorandum of Points and
4 Authorities, the Declaration of Enoch J. Kim; the Declaration of Kimberly Sutherland, the
5 Declaration of Jennifer Reyes, the pleadings, records and files in the case, and such other further
6 oral and documentary evidence which may be submitted at or before the hearing on this Motion.
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8 Dated: July 10, 2025

D.LAW, INC

9 By



10 Enoch J. Kim

11 Attorneys for Plaintiff Jennifer Reyes, on behalf
12 of herself and others similarly situated
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