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Attorneys for Plaintiff LAVONTRA BREAUX, Individually, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

VANESSA HERNANDEZ, LAVONTRA BREAUX, NARON TRIPLETT, and NATALIE FLORES Individually, and on behalf of other members of the general public similarly situated;

Plaintiffs,

vs.

PANDORA JEWELRY LLC, a Maryland Limited Liability Company; PANDORA VENTURES, LLC, a Maryland Limited Liability Company; and DOES 1-10, inclusive,

Defendants.

CASE NO. 24STCV04554

[Related Case Nos.: 23SMCV04825; 24SMCV00844; 24STCV04697; and 24STCV15396]

PLAINTIFFS' NOTICE OF *UNOPPOSED* MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Date: October 29, 2025
Time: 10:30 a.m.
Dept.: 12
Judge: Hon. Carolyn B. Kuhl

1 TO ALL PARTIES HEREIN AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on October 29, 2025, at 10:30 a.m., or as soon thereafter as the
3 matter may be heard in Department P of the above-entitled court located at 1725 Main Street, Santa
4 Monica, CA 90401, the Honorable Carolyn B. Kuhl presiding, Plaintiffs VANESSA HERNANDEZ,
5 LAVONTRA BREAUX, NARON TRIPLETT, and NATALIE FLORES, individually and on behalf
6 of other members of the general public similarly situated, will and hereby does move this Court for
7 preliminary approval of the class action settlement.

8 The unopposed motion for conditional certification of settlement class and preliminary
9 approval of the class action settlement is based upon this Notice, the Memorandum of Points and
10 Authorities in support, the Declaration of Eric K. Yaeckel, the Declaration of David D. Bibiyan, the
11 Declaration of Selena Matavosian, the Declaration of Plaintiff Naron Triplett, and attached Exhibits,
12 including the Settlement Agreement, the proposed Class Notice and the Proposed Order (filed
13 herewith) and upon such other evidence and argument at the hearing.

14
15 Dated: October 1, 2025

SULLIVAN & YAECKEL LAW GROUP, APC

Cody Archer

Eric K. Yaeckel
Ryan T. Kuhn
Cody D. Archer
Attorneys for Plaintiff LAVONTRA BREAUX, in a
Representative capacity only, and on behalf of other
members of the general public similarly situated