

D.LAW, INC.

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on behalf of himself and others similarly situated

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

JOHN PARDEE, on behalf of himself,
and others similarly situated, the State
of California, and the general public,

Plaintiff,

v.

HOLZ RUBBER COMPANY, INC., a
California corporation; HR
OUTSOURCING ASSOCIATES,
LLC, a Delaware corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2023-0010123

CLASS ACTION

Assigned for All Purposes To:
Hon. Jayne Lee
Dept.: 10C

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

*[Filed concurrently with Memorandum of Points and
Authorities; Declaration of Enoch J. Kim;
Declaration of John Pardee; and [Proposed] Order]*

Date: September 30, 2025
Time: 9:00am
Dept.: 10C

Original Complaint Filed: September 25, 2023
First Amended Complaint Filed: November 29, 2023
Second Amended Complaint Filed: December 16,
2024
Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on September 30, 2025, at 9:00 a.m. in Department 10C of
3 the Courthouse of the San Joaquin Superior Court located at 180 E. Weber Avenue, Stockton, CA
4 95202, Plaintiff John Pardee (“Plaintiff”), on behalf of himself and other similarly situated
5 employees of Defendant Holz Rubber Company, Inc. (“Defendant Holz Rubber”) and Defendant
6 HR Outsourcing Associates, LLC (“Defendant HR Outsourcing”) (hereinafter Defendant Holz
7 Rubber, and Defendant HR Outsourcing collectively referred to as “Defendants,” and Plaintiff and
8 Defendants collectively referred to as the “Parties”), will and hereby do move this Court pursuant
9 to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order of final
10 approval of the class action settlement, which will accomplish the following: certify the class for
11 settlement purposes only; approve the class action settlement embodied in the Parties’ Joint
12 Stipulation of Class Action and PAGA Settlement and Release (“Settlement Agreement”)
13 (“Settlement Agreement” or “Settlement”); confirm Plaintiff as the Class Representative; confirm
14 the appointment of Class Counsel; approve Class Counsel’s application for attorney’s fees and
15 litigation costs; approve the enhancement award to the Class Representative; and enter judgment
16 approving the class action settlement.

17 The grounds for this Motion, as set forth in the attached memorandum of points and
18 authorities and supporting declarations, are that this is a fair and reasonable settlement that benefits
19 the class and was the product of informed, non-collusive negotiations by parties who were
20 represented by experienced and able counsel. See *Dunk v. Ford Motor Co.*, 48 Cal. App. 4th 1794,
21 1802 (1996); *Manual for Complex Litigation*, (Second), § 30.44 (1985).

22 Plaintiff bases this Motion on this Notice and the accompanying Memorandum of Points
23 and Authorities, the Declarations of Enoch J. Kim, John Pardee, and Jodey Lawrence, the
24 complete pleadings, records, and files in the case, and such other further oral and documentary
25 evidence which may be submitted at or before the hearing on this Motion.

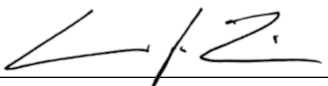
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1 Dated: September 5, 2025

Respectfully submitted,

2 D.LAW, INC.

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4 By 
5 Emil Davtyan
6 David Yeremian
7 Enoch J. Kim
8 David Arakelyan
9 Norayr Zakaryan
10 Attorneys for Plaintiff on behalf of himself
11 and others similarly situated
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