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Attorneys for Plaintiff SEAN GITTENS
on behalf of themselves and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

SEAN GITTENS, on behalf of himself and
all others similarly situated, and the general
public,

Plaintiff,

v.

NVA MASH CAPITAL PARTNERS, LP, a
California corporation; NVA MASH
VETERINARY MANAGEMENT, LP, a
California corporation; NVA ABBY GP,
INC., a California corporation; NATIONAL
VETERINARY ASSOCIATES, INC., a
Delaware corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No. 23STCV23169

*[Assigned for all purposes to the Hon. William F.
Highberger, Dept. 10]*

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

*[Filed concurrently with Memorandum of Points
and Authorities; Declaration of David
Arakelyan; [Proposed] Order and [Proposed]
Judgment]*

Date: March 11, 2026

Time: 10:00 AM

Dept.: 10

Complaint Filed: September 21, 2023

FAC Filed: December 15, 2023

Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on March 11, 2026, at 10:00 a.m. in Department 10 of the Los
3 Angeles Superior Court, located at 312 N. Spring Street, Los Angeles, CA 90012, Plaintiff SEAN
4 GITTENS (“Plaintiff”), on behalf of himself, other similarly situated employees of Defendants
5 NVA MASH CAPITAL PARTNERS, LP, a California corporation; NVA MASH VETERINARY
6 MANAGEMENT, LP, a California corporation; NVA ABBY GP, INC., a California corporation;
7 NATIONAL VETERINARY ASSOCIATES, INC (collectively “Defendant”) (hereinafter Plaintiff
8 and Defendant are collectively referred to as the “Parties”), will and hereby do move this Court
9 pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an
10 order of final approval of the class action settlement, which will accomplish the following: certify
11 the class for settlement purposes only; approve the class action settlement embodied in the Parties’
12 Joint Stipulation of Class Action Settlement and Release (“Settlement Agreement”) (“Settlement
13 Agreement” or “Settlement”); confirm Plaintiff as a Class Representatives; confirm the
14 appointment of Class Counsel; approve Class Counsel’s application for attorney’s fees and
15 litigation costs; approve the enhancement award to each 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).

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1 Plaintiff bases this Motion on this Notice and the accompanying Memorandum of Points
2 and Authorities, the Declaration of David Arakelyan and Norma Ayala, the complete pleadings,
3 records, and files in the case, and such other further oral and documentary evidence which may be
4 submitted at or before the hearing on this Motion.

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6 Dated: February 17, 2026

Respectfully submitted,

7 D.LAW, INC.

8
9 By



10 David Keledjian
11 David Arakelyan
12 Attorneys for Plaintiff SEAN GITTENS on
13 behalf of himself and others similarly
14 situated
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