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Attorneys for Plaintiff RASHEDA K. KIRBY,  
on behalf of herself and others similarly situated

*[Additional Counsel on Next Page]*

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

RASHEDA K. KIRBY and AMOURA  
BURTON, on behalf of themselves and all  
others similarly situated, and the general  
public,

*Plaintiffs,*

vs.

TROVE RECOMMERCE, INC., a  
Delaware corporation; TROVE, INC., a  
business entity of unknown form;  
YERDLE, INC., a California corporation;  
and DOES 1 through 50, inclusive,

*Defendants.*

Case No. 23CIV04345

Judge: Hon. Jeffrey R. Finigan

Department: 24

CLASS ACTION

**PLAINTIFFS' 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 Plaintiffs' Memorandum  
of Points and Authorities; Declaration of Jodey  
Lawrence; Declaration of Rasheda K. Kirby;  
Declaration of Amoura Burton; Memorandum of  
Points and Authorities; and [Proposed] Order]*

Date: August 1, 2025

Time: 2:00 p.m.

Dept.: 24

**JUSTICE FOR WORKERS, P.C.**

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Attorneys for Plaintiff AMOURA BURTON

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

2                   PLEASE TAKE NOTICE that on August 1, 2025 at 2:00 p.m., or as soon thereafter as  
3 this matter may be heard, at Department 24, located at Central Court, 800 North Humboldt St.,  
4 San Mateo, California, 94401, Plaintiff Rasheda K. Kirby (“Plaintiff Kirby”) and Plaintiff  
5 Amoura Burton (“Plaintiff Burton”) (collectively “Plaintiffs”), on behalf of themselves and all  
6 persons similarly situated, will and hereby move this Court pursuant to California Code of Civil  
7 Procedure § 382 and California Rule of Court 3.769 for an order:

8                   (1) Preliminarily approving the class action settlement reached between Plaintiffs and  
9 Defendant Trove Recommerce, Inc., formerly known as Yerdle, Inc. (“Defendant” and  
10 collectively with Plaintiff, “the Parties”) which is embodied in the Parties’ Class  
11 Action and PAGA Settlement Agreement (“Settlement” or “Settlement Agreement”),  
12 including granting preliminary approval of the following class: all current and former  
13 hourly-paid or non-exempt employees of Defendant in California during the Class  
14 Period (“Class” or “Class Members”). The Class Period is the period from September  
15 13, 2019 through June 10, 2024;

16                   (2) Approving the form of Notice of Class Action Settlement and procedure for notice to  
17 the Class; and

18                   (3) Setting the final approval hearing.

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

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

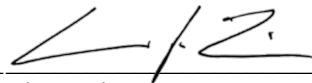
1 the Class; and that Class Members will have an opportunity to participate in and/or object to the  
2 Settlement and/or opt-out of the Settlement. Defendant does not oppose this Motion.

3 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto  
4 (including the Notice to Class Members), the accompanying Memorandum of Points and  
5 Authorities, the Declaration of Enoch J. Kim; Declaration of William C. Sung; Declaration of  
6 Jodey Lawrence; Declaration of Rasheda K. Kirby; Declaration of Amoura Burton, the pleadings,  
7 records and files in the case, and such other further oral and documentary evidence which may be  
8 submitted at or before the hearing on this Motion.

9  
10 Dated: July 10, 2025

D.LAW, INC

11 By



12 Enoch J. Kim

13 Attorneys for Plaintiff Rasheda K. Kirby, on  
14 behalf of herself and others similarly situated  
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