

D.LAW, INC.
Emil Davtyan (SBN 299363)
Roman Shkodnik (SBN 285152)
Enoch J. Kim (SBN 261146)
Amanda Fazio (SBN 346350)
Antonia McKee (SBN 344511)
450 N Brand Blvd., Suite 840
Glendale, CA 91203
Telephone: (818) 962-6465 / Facsimile: (818) 962-6469
Emails: emil@d.law, r.shkodnik@d.law, e.kim@d.law
a.fazio@d.law, a.bliznets@d.law

DAVID YEREMIAN & ASSOCIATES, INC.
David Yeremian (SBN 226337)
450 N Brand Blvd., Suite 840
Glendale, CA 91203
Telephone: (818) 962-6465 / Fax: (818) 962-6469
Email: david@yeremianlaw.com

Attorneys for Plaintiff Marissa Brown,
on behalf of herself and all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

MARISSA BROWN, an individual on
behalf of herself and all others similarly
situated,

Plaintiffs,

v.

JAZZ PHARMACEUTICALS, INC., a
Delaware corporation; and DOES 1 to 50,
inclusive,

Defendants.

CLASS ACTION

Case No.: 23CV422390

Assigned for all purposes to:
Hon. Theodore C. Zayner

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

*[filed concurrently with Memorandum of
Points and Authorities; Declaration of
Enoch J. Kim; Declaration of Sean
Hartranft; Declaration of Marissa Brown;
and [Proposed] Order]*

Hearing Information:

Date: November 19, 2025

Time: 1:30 p.m.

Dept.: 19

Action filed: September 13, 2023

FAC filed: November 17, 2023

Trial date: None Set

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TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on November 19, 2025, at 1:30 p.m. in Department 19 of the Santa Clara Superior Court located at 161 North First Street, San Jose, CA 95113, Plaintiff Marissa Brown (“Plaintiff”), on behalf of himself, and other similarly situated employees of Defendant Jazz Pharmaceuticals, Inc. (“Defendant”) (collectively, “the Parties”), will and hereby does move this Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order as proposed:

1. Preliminarily approving the proposed class-wide settlement of this action as set forth in the Parties’ Joint Stipulation of Class and PAGA Representative Action Settlement (“Settlement Agreement”), which is attached as Exhibit 1 to the Declaration of Enoch J. Kim (“Kim Decl.”), filed herewith;

2. Approving the form and method for providing notice to the Class Members and approving the form and content of the Parties’ proposed Notice of Settlement and Hearing Date for Final Court Approval (“Class Notice”) for sending to the Class Members (provided at Exhibit A to the Settlement Agreement);

3. Approving for mailing the Class Notice packet, consisting of the Court approved Class Notice and directing that it be sent to the Class Members;

4. Appointing Plaintiff Marissa Brown as Class Representative for settlement purposes only;

5. Appointing David Yeremian of David Yeremian & Associates, Inc., Emil Davtyan, Roman Shkodnik, and Amanda Fazio of D.Law, Inc. as Class Counsel for settlement purposes only.

6. Scheduling a Final Approval hearing date to consider the Parties’ request for Final Approval of the proposed Settlement and Plaintiffs’ application for Attorneys’ Fees and Costs Awards to Class Counsel for attorneys’ fees and reasonable expenses incurred in connection with this Action, and Class Representative Service Payment to Plaintiff for her services in this Action.

7. Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed settlement’s allocation of funds to claims made under Labor Code §§ 2698, *et seq.*, the

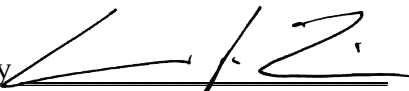
1 Private Attorneys General Act of 2004 (“PAGA”).

2 This Motion is made on the grounds that after good-faith, arm’s length negotiations, the
3 Parties have agreed upon a Settlement which is fair, reasonable, and adequate and in the best
4 interests of the Class and all Parties. Defendant does not oppose the Motion. This Notice of
5 Motion and Motion is also based on the fact that this Settlement was the product of informed,
6 non-collusive negotiations by the Parties, who were represented by experienced and able
7 counsel. *See Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex
8 Litigation (Second) (1985) § 30.44. The proposed settlement meets the legal standard for
9 preliminary approval and is in the best interests of the Class; the proposed form of Class Notice
10 explains the Settlement terms in a clear and straightforward manner; the proposed procedures for
11 notice provide the best practical notice to the Class; and Class Members will have an opportunity
12 to participate in and/or object to the settlement and/or opt-out of the settlement.

13 This Motion is based upon this Notice of Motion, the accompanying Memorandum of
14 Points and Authorities, the Declarations of Enoch J. Kim, Marissa Brown, and Sean Hartranft,
15 the [Proposed] Order, the Parties’ Settlement Agreement and Class Notice, the Court’s record of
16 this action, all matters of which the Court may take notice, and upon such oral or documentary
17 evidence as the Court may receive at or before the hearing on this unopposed Motion.

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19 DATED: October 27, 2025

D.LAW, INC.

20
21 By 

Emil Davtyan
Roman Shkodnik (SBN 285152)
Enoch J. Kim (SBN 261146)
Amanda Fazio (SBN 346350)
Antonia McKee
Attorneys for Plaintiff and Settlement Class