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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

ALEJANDRA RODGERS, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

NO ORDINARY MOMENTS, INC.; and
DOES 1 through 20, inclusive,

Defendants.

Case No. 30-2023-01349601-CU-OE-CXC

Related Case No. 30-2023-01359416-CU-OE-CXC

Assigned for all purposes to:

Hon. Melissa R. McCormick, Dept. CX105

**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND REPRESENTATIVE PAGA
SETTLEMENT**

Date: August 7, 2025

Time: 2:00 p.m.

Dept: CX105

Reservation No. 74601833

1 **TO THE COURT, ALL INTERESTED PARTIES, AND THEIR RESPECTIVE**
2 **ATTORNEYS OF RECORD:**

3 PLEASE TAKE NOTICE that on August 7, 2025 at 2:00 p.m., or as soon thereafter as the matter
4 may be heard in Department CX-105 of the above-entitled Court located at 751 W Santa Ana Blvd,
5 Santa Ana, CA 92701, Plaintiffs Alejandra Rodgers and Milania Monroe (“Plaintiffs”) will and hereby
6 do move this Court for an Order:

- 7 1. Granting preliminary approval of the proposed CLASS ACTION AND PAGA
8 SETTLEMENT AGREEMENT (“Settlement Agreement” or “Agreement”);
- 9 2. Conditionally certifying the proposed Class for settlement purposes only;
- 10 3. Appointing Plaintiffs Alejandra Rodgers and Milania Monroe as the Class Representatives;
- 11 4. Appointing Kashif Haque, Samuel Wong, Jessica L. Campbell and Kristy Connolly of
12 Aegis Law Firm, PC and Adam Rose and Manny Starr of Frontier Law Center as Class
13 Counsel;
- 14 5. Appointing ILYM Group, Inc. as the Settlement Administrator and authorizing ILYM
15 Group, Inc. to send notice of the Settlement to the Class; and
- 16 6. Setting a final approval hearing date.

17 Pursuant to California Rules of Court 3.769(d) and (e), the Motion is made on the grounds that the
18 proposed Settlement Agreement satisfies all criteria for preliminary approval under California law and
19 falls well within the range of reasonableness; the Agreement was reached through informed, arms-
20 length bargaining between experienced attorneys, and Plaintiffs and Class Counsel will fairly and
21 adequately represent the Class Members.

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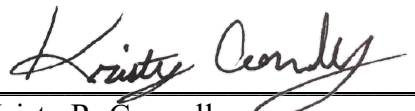
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1 The Motion is based on this Notice of Motion, Plaintiffs' Memorandum of Points and
2 Authorities in Support of Motion for Preliminary Approval of Class and Representative Action
3 Settlement, the Declaration of Kristy R. Connolly, the Declaration of Adam Rose, the Declaration of
4 Lisa Mullins of ILYM Group, Inc., and on all records and documents on file, together with such oral
5 and documentary evidence that may be presented at the hearing on this matter.

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7 Dated: July 2, 2025

AEGIS LAW FIRM, PC

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9 By: 
10 Kristy R. Connolly
11 Attorneys for Plaintiffs
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