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7 Attorneys for Plaintiffs

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SAN DIEGO-CENTRAL DIVISION

10 MICHELLE JACKSON and ERICA)
11 AUGUSTIN, individually and as)
12 aggrieved employees pursuant to the)
13 Private Attorneys General Act (“PAGA”))
14 on behalf of the State of California and)
15 similarly situated employees,)

16 Plaintiffs,

17 vs.

18 ALLIANT INTERNATIONAL)
19 UNIVERSITY, INC., a California)
20 corporation; and DOES 1 through 50,)

21 Defendants.)
22)
23)
24)
25)
26)
27)
28)

Case No.: 37-2023-00043742-CU-OE-
CTL (Consolidated with Case No.: 37-
2024-00002100-CU-OE-CTL)

**PLAINTIFFS’ NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Judge: Hon. Joel R. Wohlfeil
Dept.: 73
Hearing Date: April 4, 2025
Hearing Time: 9:00 a.m.

Complaint Filed: October 9, 2023
Trial Date: November 7, 2025

[Decl. of Thomas D. Rutledge,
[Proposed] Order, and Mem. of P&As
filed concurrently herewith]

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1 **TO ALL PARTIES, THEIR ATTORNEYS OF RECORD, AND THIS**
2 **HONORABLE COURT:**

3 PLEASE TAKE NOTICE THAT on **April 4, 2025**, at **9:00 a.m.**
4 in Department 73 of the San Diego Superior Court located at 330 West Broadway,
5 San Diego, California 92101, Plaintiffs Michelle Jackson and Erica Augustin,
6 individually and on behalf of themselves, all Aggrieved Employees, the state of
7 California as its designated proxy, and others similarly situated (Plaintiffs) will and
8 hereby do move this Court, pursuant to Code of Civil Procedure § 382, for entry of
9 the proposed Order submitted herewith: (1) provisionally certifying the Class; (2)
10 preliminarily approving the Class Action and PAGA settlement; (3) directing
11 distribution of the Class notice of settlement to the Settlement Class and Aggrieved
12 Employees; (4) appointing Thomas D. Rutledge, Esquire, as class counsel and
13 counsel for the Aggrieved Employees; (5) appointing the named Plaintiffs as class
14 representatives; and (6) setting a final approval hearing.

15 This motion is based on this Notice, Plaintiffs' Memorandum of Points and
16 Authorities, the declaration of Thomas D. Rutledge and exhibits thereto including the
17 Class Action and PAGA Settlement Agreement, and the pleadings, records and files
18 in this action and such argument and evidence which may be presented at or before
19 the hearing.

20 Dated: March 11, 2025

Law Office of Thomas D. Rutledge

21
22 By: /s/Thomas D. Rutledge

23 Thomas D. Rutledge
24 Attorneys for Plaintiffs
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PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

I, THOMAS D. RUTLEDGE, the undersigned, am employed in the County of San Diego, State of California; I am over the age of 18 and not a party to the within action; my business address is 16956 Via de Santa Fe, Suite 1847, Rancho Santa Fe, California 92091-4606.

On March 11, 2025, I served the foregoing document(s) described as:

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

on the interested parties to this action by placing a copy thereof enclosed in a sealed envelope addressed as follows: **See Attached List.**

☐ **(BY MAIL)** I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. This correspondence was deposited with the United States Postal Service this same day in the ordinary course of business at our Firm's office address in San Diego, California. Service made pursuant to this paragraph, upon motion of a party served, shall be presumed invalid if the postal cancellation date of postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.

☒ **(BY E-MAIL via E-file)** I am readily familiar with the business practice for collection and processing of correspondence for emailing with the Court authorized third-party vendor. This correspondence was sent via email via this third-party vendor pursuant to the vendor's policies and practices.

☐ **(BY OVERNIGHT DELIVERY SERVICE)** I served the foregoing document by Federal Express, an express service carrier which provides overnight delivery, as follows. I placed true copies of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed to each interested party as set forth above, with fees for overnight delivery paid or provided for.

☐ **(BY PERSONAL SERVICE)** I caused such envelope to be delivered by hand to the offices of the above named addressee(s).

☐ **(BY FACSIMILE)** I caused such documents to be delivered via facsimile to the offices of the addressee(s) at the following facsimile number:

Executed March 11, 2025, at San Diego, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

/s/THOMAS D. RUTLEDGE
THOMAS D. RUTLEDGE

SERVICE LIST

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