

Thomas D. Rutledge
Attorney-at-Law
16956 Via de Santa Fe, Suite 1847
Rancho Santa Fe, California 92091
Telephone: (619) 886-7224

1 Thomas D. Rutledge (SBN 200497)
2 Attorney-at-Law
3 16956 Via de Santa Fe, Suite 1847
4 Rancho Santa Fe, California 92091-4606
5 Telephone: (619) 886-7224
6 thomasrutledgelaw@gmail.com

7 Attorney for Plaintiffs and the Provisionally
8 Certified Class

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF SAN DIEGO-CENTRAL DIVISION

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

17 Plaintiffs,

18 vs.

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

22 Defendant.

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
FINAL APPROVAL OF CLASS AND
PAGA SETTLEMENT AND FOR
ATTORNEYS’ FEES, COSTS,
REPRESENTATIVE
ENHANCEMENT PAYMENTS,
ADMINISTRATION EXPENSES,
AND ENTRY OF JUDGMENT**

Judge: Hon. Joel R. Wohlfeil
Dept.: 73
Hearing Date: July 25, 2025
Hearing Time: 9:00 a.m.

Complaint Filed: October 9, 2023

[[Prop.] Order, Mem. of P&As, and
Decs. of Thomas D. Rutledge,
Settlement Administrator Taylor
Mitzner, Michelle Jackson, and Erica
Augustin filed concurrently herewith]

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

PLEASE TAKE NOTICE THAT on **July 25, 2025**, at **9:00 a.m.** in Department C-73 of the San Diego Superior Court located at 330 West Broadway, San Diego, California 92101, Plaintiffs Michelle Jackson and Erica Augustin, on behalf of themselves, the provisionally certified Class (collectively, “Class Members”), which have been certified for settlement purposes only, the Aggrieved Employees, and the State of California as its designated proxies (collectively, “Plaintiffs”), will and hereby move this Court pursuant to Code of Civil Procedure § 382 for final approval of a class action and Private Attorney General Act settlement, payment of Class Counsel’s fees and costs, payment of the named Plaintiffs’ representative enhancement payments and general release awards, and settlement administration expenses.

This motion is based on this Notice, Plaintiffs’ accompanying Memorandum of Points and Authorities, the accompanying declarations of Thomas D. Rutledge, Michelle Jackson, Erica Augustin, and the Settlement Administrator who handled the settlement administration of this matter so far, the pleadings, records and files in this action, and such argument and evidence that may be presented at or before the hearing.

Dated: July 1, 2025

Law Office of Thomas D. Rutledge

By: /s/Thomas D. Rutledge

Thomas D. Rutledge
Attorneys for the Plaintiffs and the
Provisionally Certified Class

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 July 1, 2025, I served the foregoing document(s) described as:

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL
APPROVAL OF CLASS AND PAGA SETTLEMENT AND FOR
ATTORNEYS' FEES, COSTS, REPRESENTATIVE ENHANCEMENT
PAYMENT, ADMINISTRATION EXPENSES, AND ENTRY OF JUDGMENT**

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 July 1, 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

JOANNA BUSER
joanne.buser@quarles.com
TRENTAN CUNNINGHAM
trent.cunningham@dquarles.com
QUARLES & BRADY LLP
101 West Broadway, Ninth Floor
San Diego, California 92101-8285

Attorneys for Defendant