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Attorneys for KENTON SAMUELS, on behalf of himself,  
all others similarly situated, and on behalf of the general public

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**IN AND FOR THE COUNTY OF SACRAMENTO**

KENTON SAMUELS on behalf of  
himself, all others similarly situated, and  
on behalf of the general public,

Plaintiffs,

v.

WIS INTERNATIONAL, INC.; CHI  
MANAGEMENT GROUP LP;  
CROSSMARK, INC.; and DOES 1-100,  
Defendants.

Case No. 23CV012186  
(Consolidated with Case No. 24CV00311)

*[Assigned for all purposes to the  
Honorable Jill Talley; Dept. 23]*

**NOTICE OF PLAINTIFF KENTON  
SAMUELS' MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION AND  
PAGA SETTLEMENT, CONDITIONAL  
CERTIFICATION, APPROVAL OF CLASS  
NOTICE, SETTING OF FINAL APPROVAL  
HEARING DATE**

Date: April 3, 2026  
Time: 9:00 a.m.

Date Filed: November 22, 2023  
Trial Date: None Set

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

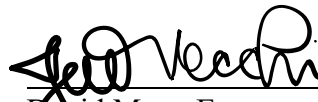
2 **PLEASE TAKE NOTICE** that on April 3, 2026, at 9:00 a.m., or as soon thereafter as the  
3 matter can be heard, in Department 23 of the Sacramento County Superior Court, located at 720  
4 9th Street, Sacramento, CA 95814, before the Honorable Jill Talley, Plaintiff Kenton Samuels will  
5 move the Court for Preliminary Approval of Class Action and PAGA Settlement; Conditional  
6 Certification; Approval of Class Notice; and Setting of Final Approval Hearing Date.

7 This motion will be based on this Notice, the Memorandum of Points and Authorities; the  
8 Declaration of David Mara, Esq.; the Declaration of Sean Hartranft on behalf of APEX; the  
9 Declaration of Plaintiff Kenton Samuels; any and all documents filed in this matter, and any  
10 argument that may be presented at the hearing, and upon such other matters as this Court may  
11 consider.

12 Pursuant to Local Rule 1.06 (A), the Court will make a tentative ruling on the merits of this  
13 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings  
14 for the department may be downloaded off the court's website. If the party does not have online  
15 access, they may call the dedicated phone number for the department as referenced in the local  
16 telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the  
17 hearing and receive the tentative ruling. If you do not call the court and the opposing party by 4:00  
18 p.m. the court day before the hearing, no hearing will be held.

19  
20 Dated: March 11, 2026

**MARA LAW FIRM, PC**

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22 \_\_\_\_\_  
23 David Mara, Esq.

Jill Vecchi, Esq.

Carter Cordura, Esq.

24 Attorneys for Plaintiff KENTON SAMUELS on  
25 behalf of himself, all others similarly situated, and on  
26 behalf of the general public  
27  
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