

D.LAW, INC.
Emil Davtyan (SBN 299363)
Emil@d.law
David Yeremian (SBN 226337)
d.yeremian@d.law
Alvin B. Lindsay (SBN 220236)
a.lindsay@d.law
Tania Fonseca (SBN 309927)
t.fonseca@d.law
Enoch J. Kim (SBN 261146)
e.kim@d.law
Antonia McKee (SBN 344511)
a.bliznets@d.law
450 N Brand Blvd, Suite 840
Glendale, CA 91203
Telephone: (818) 962- 6465
Facsimile: (818) 962-6469

Attorneys for Plaintiff, GRISELDA GONZALEZ,
on behalf of herself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

GRISELDA GONZALEZ, an individual, on
behalf of herself and others similarly
situated,

Plaintiff,

vs.

WALTER TIMMONS ENTERPRISES,
INC., dba TIMMONS VOLKSWAGEN OF
LONG BEACH, a California corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No. 23STCV24145

CLASS ACTION

Assigned for All Purposes To:
Hon. Elaine Lu

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

*[Filed concurrently with Memorandum of Points
and Authorities; Declarations of Enoch J. Kim,
Griselda Gonzalez, Kimberly Sutherland, and
Jarrett Gorlick; and [Proposed] Order Granting
Plaintiff's Motion for Preliminary Approval]*

Date: November 25, 2025
Time: 10:00 a.m.
Dept.: 9

Original Complaint Filed: October 04, 2023
First Amended Complaint Filed: March 26, 2024
Trial Date: None Set

1 **TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on November 25, 2025 at 10:00 a.m. in Department 9 of the
3 Los Angeles Superior Court located at 111 North Hill Street, Los Angeles, CA 90012, Plaintiff
4 Griselda Gonzalez (“Plaintiff”), on behalf of herself and other similarly situated employees of
5 Defendant Walter Timmons Enterprises, Inc., dba Timmons Volkswagen of Long Beach, a
6 California corporation (“Defendant”) (collectively, “the Parties”), will and hereby does move this
7 Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for
8 an order as proposed:

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

12 2. Approving the form and method for providing notice to the Class Members and
13 approving the form and content of the Parties’ proposed Notice of Class Action and PAGA
14 Settlement (“Class Notice”) for sending to the Class Members (provided at Exhibit A to the
15 Settlement Agreement (which is attached as Exhibit 1 to the Declaration of Enoch J. Kim));

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

18 4. Appointing Plaintiff Griselda Gonzalez as Class Representative for settlement
19 purposes only;

20 5. Appointing Emil Davtyan, David Yeremian, Alvin B. Lindsay, Enoch J. Kim, and
21 Antonia McKee of D.Law, Inc. as Class Counsel for settlement purposes only.

22 6. Scheduling a Final Approval hearing date to consider the Parties’ request for Final
23 Approval of the proposed Settlement and Plaintiff’s application for Class Counsel Award to Class
24 Counsel for attorneys’ fees and reasonable expenses incurred in connection with this Action, and
25 Class Representative Service Payment to Plaintiff for the service in this Action.

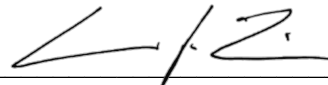
26 7. Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the
27 proposed settlement’s allocation of funds to claims made under Labor Code §§ 2698, *et seq.*, the
28 Private Attorneys General Act of 2004 (“PAGA”).

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

12 This Motion is based upon this Notice of Motion, the accompanying Memorandum of
13 Points and Authorities, the Declarations of Enoch J. Kim, Plaintiff Griselda Gonzalez, Kimberly
14 Sutherland, and Jarrett Gorlick, the [Proposed] Order granting Plaintiff's Motion for Preliminary
15 Approval of the Class Action and PAGA Settlement, the Parties' Settlement Agreement and Class
16 Notice, the Court's record of this action, all matters of which the Court may take notice, and upon
17 such oral or documentary evidence as the Court may receive at or before the hearing on this
18 unopposed Motion.

19
20 DATED: August 13, 2025

D.LAW, INC.

21 By 
22 David Yeremian
23 Alvin B. Lindsay
24 Enoch J. Kim
25 Antonia McKee
26 Attorneys for Plaintiff and Settlement Class
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