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Attorneys for Plaintiffs CAMILLE GUERIN and CAMILLE TORRES

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

CAMILLE GUERIN and CAMILLE TORRES,
individually and on behalf of others similarly
situated,

Plaintiffs,

vs.

O & A LINE MANAGEMENT, LLC; CITRIN
HOSPITALITY, INC.; MCGA HOTELS LLC;
MCGA HOTELS LA LLC; and DOES 1 through
25, inclusive,

Defendants.

Case No. 24STCV00784
[Consolidated with Case No. 24STCV00885]

Honorable Elaine Lu
Department 9

RE-NOTICE OF MOTION

Date: March 17, 2026
Time: 8:30 a.m.
Department: 9

Complaint Filed: January 10, 2024
Trial Date: Not Set

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

2 **PLEASE TAKE NOTICE THAT on March 17, 2026 at 8:30 a.m.** in Department 9 of the
3 above-captioned Court located at 312 North Spring Street, Los Angeles, California 90012, pursuant
4 to California Code of Civil Procedure section 382 and Rule 3.769 of the California Rules of Court,
5 Plaintiffs Camille Guerin and Camille Torres (together, “Plaintiffs”) will and hereby do move the
6 Court for an Order granting preliminary approval of the proposed class action and PAGA settlement
7 between Plaintiffs and Defendant O&A Line Management, LLC (“Defendant”).

8 Plaintiffs request that the Court enter an Order:

9 1. Preliminarily approving the Class Action and PAGA Settlement Agreement
10 (“Settlement” or “Settlement Agreement”) attached as Exhibit 3 to the Declaration of James S. Winn
11 Jr. in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA Settlement
12 (“Winn Decl.”);

13 2. Certifying the Class for Settlement purposes;

14 3. Appointing Plaintiffs Camille Guerin and Camille Torres as the Class Representatives
15 for Settlement purposes;

16 4. Appointing Jonathan M. Genish, Barbara DuVan-Clarke, Danielle Ling GruppChang,
17 P.J. Van Ert, Alexandra Rose, and James S. Winn Jr. of Blackstone Law, APC as Class Counsel for
18 Settlement purposes;

19 5. Approving the proposed Court Approved Notice of Class Action Settlement and
20 Hearing Date for Final Court Approval (“Class Notice”), attached as Exhibit A to the Settlement
21 Agreement, to be mailed to the Class;

22 6. Approving the opt-out and objection procedures provided in the Settlement Agreement
23 and set forth in the Class Notice;

24 7. For each Class Member, directing Defendant to furnish their full name, last-known
25 mailing address, Social Security number, and number of Workweeks and Pay Periods to the
26 Administrator within twenty-one (21) calendar days after Defendant’s counsel’s receipt of the order
27 granting preliminary approval of the Settlement;

28 8. Approving the proposed deadlines for the settlement administration process; and

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, Lorena Bautista, certify and declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 8383 Wilshire Blvd, Suite 745, Beverly Hills, California 90211. On January 8, 2026, I served a copy of the following document(s):

• **RE-NOTICE OF MOTION**

on the interested parties as follows:

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Attorneys for Defendants O & A LINE MANAGEMENT, LLC, CITRIN HOSPITALITY, INC., MCGA HOTELS LLC and MCGA HOTELS LA LLC

☒ **BY ELECTRONIC SERVICE (CASE ANYWHERE):** I caused said document(s) to be sent to the addressee(s) listed above via Case Anywhere. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

State of California, Labor & Workforce Development Agency
Web URL:

<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

☒ **BY ONLINE SUBMISSION:** The above-referenced documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(I). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on January 8, 2026 at Beverly Hills, California.

/s/ Lorena Bautista
Lorena Bautista