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Attorneys for Plaintiff ILIANA REYES,
on behalf of themselves and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF CONTRA COSTA

ILIANA REYES, on behalf of herself and
all others similarly situated, and the
general public,

Plaintiff,

v.

FIRSTAMERICA AUTOMOTIVE,
INC., a Delaware corporation;
FIRSTAMERICA AUTOMOTIVE,
LLC, a Delaware corporation; SONIC
AUTOMOTIVE, INC., a business
entity of unknown form; BEVERLY
HILLS BMW, a business entity of
unknown form; ECHO PARK
AUTOMOTIVE, a business entity of
unknown form; and DOES 1 through
50, inclusive,

Defendants.

Case No. C23-02820

[Assigned for all purposes to the Hon. John P.
Devine, Dept. 9]

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

*[Filed concurrently with the Declaration of David
Keledjian; Declaration of Kimberly Sutherland;
Declaration of Eric Lietzow; Declaration of Iliana
Reyes; and [Proposed] Order]*

Date: December 15, 2025

Time: 9:00AM

Dept.: 9

Original Complaint Filed: November 6, 2023

First Amended Complaint Filed: January 10, 2024

Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on December 15, 2025, at 9:00 a.m. in Department 9 of the
3 Courthouse of the Contra Costa County Superior Court located at 725 Court Street, Martinez, CA
4 94553, Plaintiff ILIANA REYES (“Plaintiff”), on behalf of herself and other similarly situated
5 employees of FIRSTAMERICA AUTOMOTIVE, INC., FIRSTAMERICA AUTOMOTIVE,
6 LLC, SONIC AUTOMOTIVE, INC., BEVERLY HILLS BMW, and ECHO PARK
7 AUTOMOTIVE (“Defendants”) (Defendants and Plaintiff together referred to as the “Parties”),
8 will and hereby do move this Court pursuant to California Code of Civil Procedure § 382 and
9 California Rule of Court 3.769 for an order as proposed:

- 10 (1) Preliminarily approving the class action settlement reached between Plaintiff and
11 Defendants, including granting preliminary approval of the following class: “all
12 persons employed by Defendants, collectively or separately, and/or any staffing
13 agencies and/or any other third parties in hourly, non-exempt positions in California
14 during the Class Period,” which is the period from August 1, 2021, through September
15 30, 2025.
- 16 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
17 the class; and
- 18 (3) Setting the final approval hearing.

19 Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed
20 settlement’s allocation of funds to claims made under the Labor Code Private Attorneys General
21 Act of 2004 (“PAGA”).

22 This Notice of Motion and Motion is based on the fact that this is a fair and reasonable
23 settlement that benefits the class and was the product of informed, non-collusive negotiations by
24 the parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.*
25 (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985)§ 30.44. The
26 proposed settlement meets the legal standard for preliminary approval and is in the best interests
27 of the class; the proposed form of notice explains the settlement terms in a clear and
28 straightforward manner; the proposed procedures for notice provide the best practical notice to

1 the class; and that Class Members will have an opportunity to participate in and/or object to the
2 settlement and/or opt-out of the settlement. Defendants do not oppose the Motion.

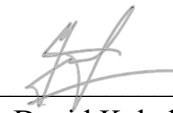
3 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto
4 (including the Notice to Class Members), the accompanying Memorandum of Points and
5 Authorities, the Declaration of David Arakelyan, the Declaration of Kimberly Sutherland, the
6 Declaration of Eric R. Lietzow, the Declaration of Iliana Reyes, the pleadings, records and files in
7 the case, and such other further oral and documentary evidence which may be submitted at or
8 before the hearing on this Motion.

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11 Dated: November 26, 2025

Respectfully submitted,

12 D.LAW, INC.

13
14 By



15 David Keledjian
16 David Arakelyan
17 Attorneys for Plaintiff ILIANA REYES, on
18 behalf of herself and others similarly situated
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