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Attorneys for Plaintiff ILIANA REYES,
on behalf of herself 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. Benjamin
Reyes II, Dept. 16]

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

*[Filed concurrently with Memorandum of Points
and Authorities; Declaration of David
Arakelyan; [Proposed] Order and [Proposed]
Judgment]*

Date: June 10, 2026
Time: 9:00A.M.
Dept.: 16

Complaint Filed: November 6, 2023
FAC 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 June 10, 2026, at 9:00 a.m. in Department 16 of the Contra Costa
3 Superior Court, Wakefield Taylor Courthouse, located at 725 Court Street, Martinez, CA 94553,
4 Plaintiff ILIANA REYES (“Plaintiff”), on behalf of herself, other similarly situated employees of
5 Defendants FIRSTAMERICA AUTOMOTIVE, INC., a Delaware corporation; FIRSTAMERICA
6 AUTOMOTIVE, LLC, a Delaware corporation; SONIC AUTOMOTIVE, INC., a business entity
7 of unknown form; BEVERLY HILLS BMW, a business entity of unknown form; ECHO PARK
8 AUTOMOTIVE, a business entity of unknown form (collectively “Defendant”) (hereinafter
9 Plaintiff and Defendant are collectively referred to as the “Parties”), will and hereby do move this
10 Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for
11 an order of final approval of the class action settlement, which will accomplish the following:
12 certify the class for settlement purposes only; approve the class action settlement embodied in the
13 Parties’ Joint Stipulation of Class Action Settlement and Release (“Settlement Agreement”)
14 (“Settlement Agreement” or “Settlement”); confirm Plaintiff as a Class Representatives; confirm
15 the appointment of Class Counsel; approve Class Counsel’s application for attorney’s fees and
16 litigation costs; approve the enhancement award to each Class Representative; and enter judgment
17 approving the class action settlement.

18 The grounds for this Motion, as set forth in the attached memorandum of points and
19 authorities and supporting declarations, are that this is a fair and reasonable settlement that benefits
20 the class and was the product of informed, non-collusive negotiations by parties who were
21 represented by experienced and able counsel. See *Dunk v. Ford Motor Co.*, 48 Cal. App. 4th 1794,
22 1802 (1996); Manual for Complex Litigation, (Second), § 30.44 (1985).

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1 Plaintiff bases this Motion on this Notice and the accompanying Memorandum of Points
2 and Authorities, the Declaration of David Arakelyan and Beth Paris, the complete pleadings,
3 records, and files in the case, and such other further oral and documentary evidence which may be
4 submitted at or before the hearing on this Motion.

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6 Dated: May 18, 2026

Respectfully submitted,

7 D.LAW, INC.
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9 By: _____

10 David Keledjian
11 David Arakelyan
12 Attorneys for Plaintiff ILIANA REYES on
13 behalf of herself and others similarly situated
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