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Attorneys for Plaintiffs, Desiree Saenz and Quiana Boyette

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

QUIANA BOYETTE, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

INCLUSION SPECIALIZED PROGRAMS
LLC, a limited liability company; and DOES 1
through 10, inclusive,

Defendants.

DESIREE SAENZ, on behalf of herself and all
other similarly situated employees, and on
behalf of the general public;

Plaintiffs,

vs.

INCLUSION SPECIALIZED PROGRAMS,
LLC, a California Limited Liability Company,
and DOES 1 through 10, inclusive,

Defendants.

Case No. 23STCV29286
[Related Case No. 24STCV05482]

**PLAINTIFFS' NOTICE OF MOTION
AND UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT AND PROVISIONAL
CERTIFICATION OF CLASS**

Date: April 24, 2026
Time: 11:30 a.m.
Dept.: 10

[Filed concurrently with Memorandum of
Points and Authorities; Declaration of Roman
Otkupman; Declaration of Thiago Coelho;
Declaration of Plaintiff Quiana Boyette;
Declaration of Plaintiff Desiree Saenz; and
[Proposed] Order]

TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on the date and time as set forth above, or as soon thereafter as the matter may be heard, in Department 10 of the Los Angeles County Superior Court, located at 312 North Spring Street, Los Angeles, California 90012, Plaintiffs QUIANA BOYETTE and DESIREE SAENZ (“Plaintiffs”), individually, and on behalf of other members of the general public similarly situated and on behalf of other aggrieved employees, as proposed representatives of the class, will and hereby do move the Court for the following:

1. Preliminary and conditional certification of the Class as described in the Class Action and PAGA Settlement Agreement (“Settlement Agreement”) (attached as **Exhibit “B”** to the declaration of Roman Otkupman filed concurrently herewith) between Plaintiffs and Defendant for purposes of settlement;

2. Preliminary approval of the Gross Settlement Amount of \$825,000.00;

3. Preliminary approval of Plaintiffs Quiana Boyette and Desiree Saenz as Class Representatives;

4. Preliminary approval of Otkupman Law Firm, A Law Corporation and Wilshire Law Firm, PLC as Class Counsel.

5. Preliminary approval of settlement of the claims as set forth in the Settlement Agreement;

6. Approval as to the form and content of the proposed Class Notice and Exclusion Form, in the forms attached, respectively as **Exhibit “C”** and **Exhibit “D”** to the Declaration of Roman Otkupman, or in forms otherwise approved by the Court;

7. Approval of ILYM Group, Inc. as Settlement Administrator and the costs of administration of the settlement for an amount up to \$12,000.00;

8. Preliminary approval of the payment of service payments to the Class Representatives, Quiana Boyette and Desiree Saenz, in the amount of \$10,000.00 each;

9. Preliminary approval of the application for payment to Class Counsel of reasonable attorneys’ fees in the amount of one-third (1/3) of the Gross Settlement Amount, or \$275,000.00 and reimbursement of costs up to \$30,000.00;

10. Preliminary approval of PAGA penalties in the amount of \$41,250.00; and

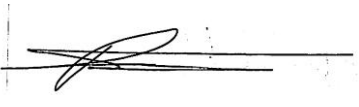
11. Issuance of a schedule for implementation of the terms of the Settlement Agreement, including a date for a hearing for Final Approval of the Settlement;

The motion is based upon this Notice, the accompanying Memorandum of Points and

1 Authorities, the Declaration of Roman Otkupman in support thereof, along with the attached
2 settlement agreement and exhibits thereto, the Declaration of Thiago Coelho in support thereof, the
3 Declaration of Plaintiff Quiana Boyette in support thereof, the Declaration of Plaintiff Desiree Saenz
4 in support thereof, the proposed Order submitted herewith, all other records, pleadings and papers
5 filed in this action and upon such other documentary and oral evidence or argument as may be
6 presented to the court at the hearing of this motion.

7 DATED: January 2, 2026

OTKUPMAN LAW FIRM,
A Law Corporation

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9 By: 

10 _____
11 Roman Otkupman
12 Nidah Farishta
13 Attorneys for Plaintiffs
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