

D.LAW, INC.

David Keledjian (SBN 309135)

David Arakelyan (SBN 337076)

Enoch J. Kim (SBN 261146)

Antonia McKee (SBN 344511)

250 N Madison Avenue, 2nd Floor

Pasadena, CA 91101-1639

Telephone: (818) 962-6465

Facsimile: (818) 962-6469

Emails: d.keledjian@d.law, d.arakelyan@d.law,

e.kim@d.law, a.bliznets@d.law

Attorneys for Plaintiffs

TEDDY LAWRENCE DREHER and CUTRENIA M. SAXON,

individually and on behalf of all others similarly situated

Additional counsel listed on next page:

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

TEDDY LAWRENCE DREHER, on
behalf of himself and all others similarly
situated, and the general public,

Plaintiffs,

v.

CENTER FOR EMPLOYMENT
OPPORTUNITIES, INC., a New York
corporation; and DOES 1 through 50,
inclusive,

Defendants.

CLASS ACTION

Case No. 23CV007758

Assigned for All Purposes To:
Honorable Lauri Damrell
Dept. 22

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

*[Filed concurrently with Memorandum of
Points and Authorities; Declarations of
Enoch J. Kim, Sean Hartranft, Teddy
Lawrence, Cutrenia M. Saxon, Curtisha
Holden, Matthew J. Matern, Luke Perry,
and Paul K. Haines; and [Proposed]
Order]*

Date: July 17, 2026

Time: 9:00 a.m.

Dept.: 22

Reservation Number: A-07758-001

Action filed: September 1, 2023

FAC filed: July 9, 2024

Trial: None Set

1 **MATERN LAW GROUP, PC**

Matthew J. Matern (SBN 159798)

2 Deanna S. Leifer (SBN 265840)

3 2101 E. El Segundo Blvd., Suite 403

El Segundo, CA 90245

4 Tel: (310) 531-1900

Facsimile: (310) 531-1901

5 Emails: mmatern@maternlawgroup.com,

6 dleifer@maternlawgroup.com

7 Attorneys for Plaintiff CURTISHA HOLDEN,
8 individually and on behalf of all others similarly situated

9 **HAINES LAW GROUP, APC**

Paul K. Haines (SBN 248226)

10 Sean M. Blakely (SBN 264384)

11 2155 Campus Drive, Suite 180

El Segundo, California 90245

12 Tel: (424) 292-2350

Fax: (424) 292-2355

13 Emails: phaines@haineslawgroup.com,

14 sblakely@haineslawgroup.com

15 Attorneys for Plaintiff LUKE PERRY,
16 individually and on behalf of all others similarly situated

TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on July 17, 2026, at 9:00 a.m. in Department 22 of the Sacramento Superior Court located at 720 Ninth Street, Sacramento, CA 95814, Plaintiffs Teddy Lawrence Dreher (“Dreher”), Cutrenia M. Saxon (“Saxon”), Curtisha Holden (“Holden”), and Luke Perry (“Perry”) (collectively, “Plaintiffs”), on behalf of themselves, and other similarly situated employees of Defendant Center for Employment Opportunities, Inc. (“Defendant”) (collectively, “the Parties”), will and hereby does move this Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order as proposed:

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

2. Approving the form and method for providing notice to the Class Members and approving the form and content of the Parties’ proposed Notice of Class Action and PAGA Settlement and Hearing Date for Final Court Approval (“Class Notice”) for sending to the Class Members (provided at Exhibit A to the Settlement Agreement);

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

4. Appointing Plaintiffs Teddy Lawrence Dreher, Cutrenia M. Saxon, Curtisha Holden, and Luke Perry as Class Representatives for settlement purposes only;

5. Appointing Emil Davtyan, David Yeremian, David Keledjian, David Arakelyan, Enoch J. Kim, and Norayr Zakaryan of D.Law, Inc.; Matthew J. Matern and Deanna S. Leifer of Matern Law Group, P.C.; and Paul K. Haines, Sean M. Blakely, and Joel M. Gordon of Haines Law Group, APC as Class Counsel for settlement purposes only.

6. Scheduling a Final Approval hearing date to consider the Parties’ request for Final Approval of the proposed Settlement and Plaintiffs’ application for Attorneys’ Fees and Costs Awards to Class Counsel for attorneys’ fees and reasonable expenses incurred in connection with

1 this Action, and Class Representative Service Payments to Plaintiffs for their services in this
2 Action.

3 7. Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the
4 proposed settlement's allocation of funds to claims made under Labor Code §§ 2698, *et seq.*, the
5 Private Attorneys General Act of 2004 ("PAGA").

6 Under the terms of the Settlement, the Parties have agreed that all claims brought on
7 behalf of the Class Members shall be fully and finally resolved for the total sum of
8 \$2,299,500.00 ("Gross Settlement Amount") to be paid on a non-reversionary basis. The amount
9 remaining of the Gross Settlement Amount after the following deductions have been made ("Net
10 Settlement Amount") shall be available for distribution to Class Members who do not opt out of
11 the Settlement:

- 12 • Up to one-third of the Gross Settlement Amount, or **\$766,500.00**, to Class
13 Counsel as attorneys' fees for the litigation and resolution of this Action and
14 actual costs incurred in this Action;
- 15 • A not-to-exceed amount of **\$40,000.00** to the Settlement Administrator for its
16 costs of administration of the Settlement;
- 17 • Up to **\$10,000.00** to each named Plaintiff as an award for their service as a class
18 representative; and
- 19 • **\$100,000.00** for settlement of claims for civil penalties under PAGA, with 25%
20 (\$25,000.00) allocated to the PAGA Members ("Individual PAGA Payments")
21 and 75% (\$75,000.00) allocated to the LWDA ("LWDA PAGA Payment").

22 This Motion is made on the grounds that after good-faith, arm's length negotiations, the
23 Parties have agreed upon a Settlement which is fair, reasonable, and adequate and in the best
24 interests of the Class and all Parties. Defendant does not oppose the Motion. This Notice of
25 Motion and Motion is also based on the fact that this Settlement was the product of informed,
26 non-collusive negotiations by the Parties, who were represented by experienced and able
27 counsel. *See Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex
28 Litigation (Second) (1985) § 30.44. The proposed settlement meets the legal standard for

1 preliminary approval and is in the best interests of the Class; the proposed form of Class Notice
2 explains the Settlement terms in a clear and straightforward manner; the proposed procedures for
3 notice provide the best practical notice to the Class; and Class Members will have an opportunity
4 to participate in and/or object to the settlement and/or opt-out of the settlement.

5 This Motion is based upon this Notice of Motion, the accompanying Memorandum of
6 Points and Authorities, the Declarations of Enoch J. Kim, Sean Hartranft, Teddy Lawrence,
7 Cutrenia M. Saxon, Curtisha Holden, Matthew J. Matern, Luke Perry, and Paul K. Haines, the
8 [Proposed] Order, the Parties' Settlement Agreement and Class Notice, the Court's record of this
9 action, all matters of which the Court may take notice, and upon such oral or documentary
10 evidence as the Court may receive at or before the hearing on this unopposed Motion.

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12 Dated: March 2, 2026

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14 D.LAW, INC.

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16 By /s/ Enoch J. Kim
17 David Keledjian, Esq.
18 David Arakelyan, Esq.
19 Enoch J. Kim, Esq.
20 Antonia McKee, Esq.
21 Attorneys for Plaintiffs and Settlement Class
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