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Attorneys for Plaintiff Juan Manuel Gomez, individually,
and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

JUAN MANUEL GOMEZ, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

WESTCOAST PARATRANSIT, INC.;
GOOD CARE MEDICAL TRANSPORT
NON-EMERGENCY.; and DOES 1 through
20, inclusive,

Defendants.

Case No. 2024CUOE020092

*Assigned for all purposes to:
Hon. Charmaine H Buehner
Dept. J4*

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

Date: July 8, 2025

Time: 8:30 a.m.

Dept: J4

1 **TO THE COURT, ALL INTERESTED PARTIES, AND THEIR RESPECTIVE ATTORNEYS**
2 **OF RECORD:**

3 PLEASE TAKE NOTICE that on July 8, 2025 at 8:30 a.m., or as soon thereafter as the matter
4 may be heard in Department 21 of the above-entitled Court located at 4353 East Vineyard Ave. Oxnard,
5 CA 93036, Plaintiff Juan Manuel Gomez ("Plaintiff") will and hereby does move this Court for an Order:

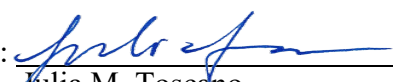
- 6 1. Granting preliminary approval of the proposed Class and PAGA Settlement Agreement
7 ("Settlement Agreement" or "Agreement");
- 8 2. Conditionally certifying the proposed Class for settlement purposes only;
- 9 3. Appointing Plaintiff Juan Manuel Gomez as the Class Representative;
- 10 4. Appointing Aegis Law Firm, PC as Class Counsel;
- 11 5. Appointing ILYM Group, Inc. as the Settlement Administrator and authorizing ILYM
12 Group, Inc. to send notice of the Settlement to the Class Members; and
- 13 6. Setting a final approval hearing date.

14 Pursuant to California Rules of Court 3.769(d) and (e), the Motion is made on the grounds that the
15 proposed Settlement Agreement satisfies all criteria for preliminary approval under California law and
16 falls well within the range of reasonableness; the Agreement was reached through informed, arms-
17 length bargaining between experienced attorneys, and Plaintiff and Class Counsel will fairly and
18 adequately represent the Class Members.

19 The Motion is based on this Notice of Motion, Plaintiff's Memorandum of Points and
20 Authorities in Support of Motion for Preliminary Approval of Class and Representative Action
21 Settlement, the Declaration of Julia M. Toscano, the Declaration of Juan Manuel Gomez, the
22 Declaration of Lisa Mullins, and on all records and documents on file, together with such oral and
23 documentary evidence that may be presented at the hearing on this matter.

24 Dated: June 10, 2025

AEGIS LAW FIRM

25 By: 
26 Julia M. Toscano
27 Attorneys for Plaintiff
28 JUAN MANUEL GOMEZ