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on behalf of himself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO

WILLIAM R. R. LITTLE, an individual, on
behalf of himself and others similarly situated,

Plaintiff,

vs.

STARVISTA, a California corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 24-CIV-00279

CLASS ACTION

Assigned for All Purposes To:
Hon. Nicole S. Healy
Dept.: 28

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

*[Filed concurrently with Memorandum of
Points and Authorities; Declarations of David
Yeremian, Enoch J. Kim, and William R. R.
Little; and [Proposed] Order Granting
Plaintiff's Motion for Preliminary Approval]*

Date: March 26, 2025
Time: 2:00 p.m.
Dept.: 28

Original Complaint Filed: January 16, 2024
First Amended Complaint Filed: March 21, 2024
Trial Date: None Set

TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 26, 2025 at 2:00 p.m. in Department 28 of the Central Court of the San Mateo Superior Court located at 800 North Humboldt St. San Mateo, CA 94401, Plaintiff William R. R. Little ("Plaintiff"), on behalf of himself and other similarly situated employees of Defendant StarVista ("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' Class Action and PAGA Settlement Agreement ("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 and PAGA Action Settlement ("Class Notice") for sending to the Class Members (provided at Exhibit A to the Settlement Agreement (which is attached as Exhibit 1 to the Declaration of Enoch J. Kim));

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

4. Appointing Plaintiff William R. R. Little as Class Representative for settlement purposes only;

5. Appointing Emil Davtyan, David Yeremian, Alvin B. Lindsay, Rose Sorial, Enoch J. Kim, and Melissa Rodriguez of D.Law, Inc. 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 Plaintiff's application for Class Counsel Fees Payment and Class Counsel Litigation Expenses Payment.

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

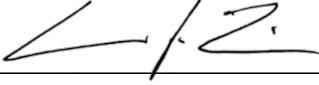
This Motion is made on the grounds that after good-faith, arm's length negotiations, the Parties have agreed upon a Settlement which is fair, reasonable, and adequate and in the best

1 interests of the Class and all Parties. Defendant does not oppose the Motion. This Notice of
2 Motion and Motion is also based on the fact that this Settlement was the product of informed, non-
3 collusive negotiations by the Parties, who were represented by experienced and able counsel. See
4 *Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation
5 (Second) (1985) § 30.44. The proposed settlement meets the legal standard for preliminary
6 approval and is in the best interests of the Class; the proposed form of Notice explains the
7 Settlement terms in a clear and straightforward manner; the proposed procedures for notice
8 provide the best practical notice to the Class; and Class Members will have an opportunity to
9 participate in and/or object to the settlement and/or opt-out of the settlement.

10 This Motion is based upon this Notice of Motion, the accompanying Memorandum of
11 Points and Authorities, the Declarations of Class Counsel David Yeremian and Enoch J. Kim, and
12 the Declaration of Plaintiff William R. R. Little, the [Proposed] Order granting Plaintiff's Motion
13 for Preliminary Approval of the Class Action and PAGA Settlement Agreement, the Parties'
14 Settlement Agreement and Class Notice, the Court's record of this action, all matters of which the
15 Court may take notice, and upon such oral or documentary evidence as the Court may receive at or
16 before the hearing on this unopposed Motion.

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18 DATED: February 19, 2025

D.LAW, INC.

19 By 
20 David Yeremian
21 Alvin B. Lindsay
22 Enoch J. Kim
23 Attorneys for Plaintiff and Settlement Class
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