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on behalf of herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SONOMA

CHRISTINA CANSLER, on behalf of herself and others similarly situated, Plaintiff, vs. SILVER OAK WINE CELLARS LLC, a California limited liability company; TWOMEY, an entity of unknown form; and DOES 1 through 50, inclusive, Defendants.	Case No.: 24CV01488 CLASS ACTION Assigned for All Purposes To: Hon. Dana Beernink Simonds Courtroom: 18 **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 Enoch J. Kim, Christina Cansler, and Kimberly Sutherland; and [Proposed] Order]* Date: Time: Courtroom: 18 Original Complaint Filed: February 29, 2024 First Amended Complaint Filed: May 6, 2024 Trial Date: None Set

TO THE COURT, DEFENDANT, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on _____, at _____a.m./p.m. in Department 18 of the Sonoma County Superior Court located at 3055 Cleveland Avenue, Santa Rosa, CA 95403, Plaintiff Christina Cansler ("Plaintiff"), on behalf of herself and other similarly situated employees of Defendant Silver Oak Wine Cellars, LLC ("Defendant") (collectively, "the Parties"), will and hereby moves 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' Stipulation of Class Action Settlement and Release of Claims ("Settlement Agreement"), which is attached as **Exhibit 1** to the Declaration of Enoch J. Kim ("Kim Decl."), filed concurrently 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 Settlement ("Class Notice") for sending to the Class Members (provided at **Exhibit A** to the Settlement Agreement);

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

4. Appointing Plaintiff Christina Cansler as Class Representative for settlement purposes only;

5. Appointing 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 a Class Counsel Award for attorneys' fees and costs to Class Counsel for reasonable expenses incurred in connection with this Action and Class Representative Premium to Plaintiff for her services in this Action;

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 interests

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

This Motion is based upon this Notice of Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Class Counsel Enoch J. Kim, the Declarations of Kimberly Sutherland and Plaintiff Christina Cansler submitted with this Motion, the [Proposed] Order Granting Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, the Court's record of this action, all matters of which the Court may take notice, and upon such oral or documentary evidence as the Court may receive at or before the hearing on this unopposed Motion.

DATED: October 13, 2026

D.LAW, INC.

By _____

Enoch J. Kim
Arianna N. Razi
Attorneys for Plaintiff and Class