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Attorneys for Plaintiff SERGIO DE LEON,
on behalf of himself and others similarly situated

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

SERGIO DE LEON, on behalf of himself
and others similarly situated,

Plaintiff,

vs.

STG INTERNATIONAL, INC., a Virginia
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 2024CUOE020994

Judge: Hon. Benjamin F. Coats

Department: 43

CLASS ACTION

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR AN ORDER (1)
PRELIMINARILY APPROVING THE
CLASS ACTION SETTLEMENT; (2)
APPROVING NOTICE OF CLASS ACTION
SETTLEMENT; AND (3) SETTING
HEARING FOR FINAL APPROVAL**

*[filed concurrently with Plaintiff's Memorandum
of Points and Authorities; Declaration of Enoch
J. Kim; Declaration of Sean Hartranft;
Declaration of Sergio De Leon; and [Proposed]
Order]*

Date: May 21, 2025
Time: 8:30 a.m.
Dept.: 43

1 **TO THE COURT AND DEFENDANTS AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on May21, 2025 at 8:30 a.m., or as soon thereafter as this
3 matter may be heard, at Department 43, located at the Hall of Justice, 880 South Victoria Ave.,
4 Ventura, California, 93009, Plaintiff Sergio De Leon (“Plaintiff”), on behalf of himself and all
5 persons similarly situated, will and hereby moves this Court pursuant to California Code of Civil
6 Procedure § 382 and California Rule of Court 3.769 for an order:

- 7 (1) Preliminarily approving the class action settlement reached between Plaintiff and
8 Defendant STG International, Inc. (“Defendant”, collectively with Plaintiff, “the
9 Parties”) which is embodied in the Parties’ Class Action and PAGA Settlement
10 Agreement (“Settlement” or “Settlement Agreement”), including granting preliminary
11 approval of the following class: all persons employed by Defendant in California and
12 classified as a non-exempt hourly employee who worked for Defendant during the
13 Class Period (“Class” or “Class Members”). The Class Period is the period from
14 February 22, 2020, through October 24, 2024;
- 15 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
16 the Class; and
- 17 (3) Setting the final approval hearing.

18 Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed
19 Settlement’s allocation of funds to claims made under the Labor Code Private Attorneys General
20 Act of 2004 (“PAGA”).

21 This Notice of Motion and Motion is based on the fact that this is a fair and reasonable
22 settlement that benefits the Class and was the product of informed, non-collusive negotiations by
23 the Parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.*
24 (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44.
25 The proposed Settlement meets the legal standard for preliminary approval and is in the best
26 interests of the Class; the proposed form of notice explains the settlement terms in a clear and
27 straightforward manner; the proposed procedures for notice provide the best practical notice to
28 the Class; and that Class Members will have an opportunity to participate in and/or object to the

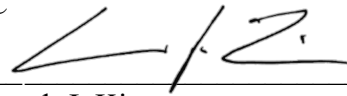
1 Settlement and/or opt-out of the Settlement. Defendant does not oppose this Motion.

2 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto
3 (including the Notice to Class Members), the accompanying Memorandum of Points and
4 Authorities, the Declaration of Enoch J. Kim; the Declaration of Sean Hartranft, the Declaration
5 of Sergio De Leon, the pleadings, records and files in the case, and such other further oral and
6 documentary evidence which may be submitted at or before the hearing on this Motion.

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8 Dated: April 25, 2025

D.LAW, INC

9 By



10 Enoch J. Kim

11 Attorneys for Plaintiff Sergio De Leon, on behalf
12 of himself and others similarly situated
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