

1 BRANDON BROUILLETTE, ESQ. (SBN 273156)
bbrouillette@crosnerlegal.com

2 ZACHARY M. CROSNER, ESQ. (SBN 272295)
zach@crosnerlegal.com

3 **CROSNER LEGAL, P.C.**

4 9440 Santa Monica Blvd., Suite 301

Beverly Hills, CA 90210

5 Tel. (866) 276-7637

6 Fac. (818) 700-9973

7 Attorneys for Plaintiff ARTHUR QUESADA

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF ALAMEDA**

11
12 ARTHUR QUESADA, as an individual and
on behalf of all others similarly situated,

13
14 Plaintiff,

15 v.

16 XPDEL, INC., a California Corporation
17 and DOES 1-100, inclusive, ADVATIX,
18 INC., a Delaware Corporation, and DOES
1-100, inclusive,

19 Defendants.

Case No.: 23CV031688

Assigned for All Purposes to:
Hon. Michael Markman
Dept. 23

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND REQUEST FOR
ATTORNEY'S FEES AND COSTS**

Date: June 10, 2025
Time: 10:00 a.m.
Dept. 23

Reservation No.: **A-31688-001**

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on June 10, 2025, at 10:00 a.m., or as soon thereafter as
3 the matter may be heard, in Department 23 of the above-captioned Court, located at 1221 Oak
4 Street, Oakland, California, plaintiff Arthur Quesada, on behalf of himself and the conditionally
5 certified settlement class, will and hereby does move the Court for an order granting final approval
6 of the proposed class action and PAGA settlement, approving the payment of civil penalties,
7 approving the class representative service payment provided for the class action settlement, and
8 approving payment of the Settlement Administrator's fees and expenses. Plaintiff also will and
9 hereby does move the Court for an order granting an award of attorney's fees in the amount of
10 \$58,333.33 (1/3 of the gross settlement amount) and costs in the amount of \$14,522.07, as
11 provided in the proposed class action settlement.

12 This motion is brought under California Rule of Court 3.769, on the grounds that the
13 settlement is fair, reasonable and adequate and in the best interests of the class, and meets all
14 requirements for class certification. The requested class representative service payment is fair and
15 reasonable under the circumstances of the case. The requested attorney's fees and costs are fair
16 and reasonable under the circumstances of the case.

17 This motion will be based on this Notice of Motion and Motion, the accompanying
18 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying
19 Declarations of Brandon K. Brouillette and Lluvia Islas, the Court's entire file herein, and on such
20 further evidence and argument as may be presented at the hearing.

21
22 Dated: May 14, 2025

CROSNER LEGAL, P.C.

23
24 By: 
25 Zachary M. Crosner
26 Brandon K. Brouillette
27 Attorneys for Plaintiff Arthur Quesada
28