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Attorneys for Plaintiff PAUL GARVES
on behalf of himself and other similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

PAUL GARVES, on behalf of himself and all
others similarly situated, and the general
public,

Plaintiff,

vs.

SAN FRANCISCO FIRE CREDIT UNION,
a California corporation; and DOES 1
through 50, inclusive,

Defendants.

CLASS ACTION

Case No. CGC-24-613197

Honorable Ethan P. Schulman
Department 304

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

Date: June 16, 2026
Time: 11:00 a.m.
Dept.: 304

**Dept. 304 has pre-approved the Date and
Time**

Action filed: March 18, 2024
First Amended Complaint: August 5, 2024
Trial date: None Set

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

2 PLEASE TAKE NOTICE that on June 16, 2026, at 11:00 a.m. in Department 304 of the
3 Courthouse of the San Francisco Superior Court located at 400 McAllister Street, San Francisco,
4 CA 94102, Plaintiff PAUL GARVES (“Plaintiff”), on behalf of himself and other similarly
5 situated employees of Defendant SAN FRANCISCO FIRE CREDIT UNION (“Defendant”) will
6 and hereby do move this Court pursuant to California Code of Civil Procedure § 382 and
7 California Rule of Court 3.769 for an order as proposed:

8 (1) Preliminarily approving the class action settlement reached between Plaintiff and
9 Defendant, including granting preliminary approval of the following class: “all current
10 and former non-exempt employees of San Francisco Fire Credit Union who worked in
11 California during the Class Period.”

12 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
13 the Class; and

14 (3) Setting the final approval hearing.

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

18 Pursuant to the proposed Class Action and PAGA Settlement Agreement (“Settlement” or
19 “Settlement Agreement”), filed concurrently herewith, Defendant does not oppose the
20 preliminary approval of the class action settlement.

21 Under the terms of the Settlement, the Parties have agreed that all claims brought on
22 behalf of the Class Members shall be fully and finally resolved for the total sum of Six Hundred
23 and Fifty Thousand Dollars and Zero Cents (\$650,000.00) (“Gross Settlement Amount”) to be
24 paid on a non-reversionary basis. The amount remaining of the Gross Settlement Amount after
25 the following deductions have been made (“Net Settlement Amount”) shall be available for
26 distribution to Class Members who do not opt out of the settlement:

- 27 • Up to one-third of the GSA, or \$216,666.67, to Class Counsel for attorneys’ fees,
28 currently estimated not to exceed \$25,000.00, to Class Counsel for reimbursement

1 of reasonable expenses incurred to prosecute the Action;

- 2 • Up to \$8,000.00 (currently estimated not to exceed \$5,950) to the Administrator
3 for its fees and costs to administer the Settlement
4 • Up to \$5,000.00 to the named Plaintiff as a Class Representative Service Payment
5 for service as the class representative; and
6 • \$40,000.00 for settlement of claims for civil penalties under PAGA, with 25%
7 allocated to the Aggrieved Employees (\$10,000.00) and 75% allocated to the
8 LWDA (\$30,000.00) will be paid to the LWDA.

9 This Notice of Motion and Motion is based on the fact that this is a fair and reasonable
10 settlement that benefits the class and was the product of informed, non-collusive negotiations by
11 the parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.*
12 (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44.
13 The proposed settlement meets the legal standard for preliminary approval and is in the best
14 interests of the class; the proposed form of notice explains the settlement terms in a clear and
15 straightforward manner; the proposed procedures for notice provide the best practical notice to
16 the class; and that Class Members will have an opportunity to participate in and/or object to the
17 settlement and/or opt-out of the settlement.

18 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto
19 (including the Notice to Class Members), the accompanying Memorandum of Points and
20 Authorities, the Declaration of Marta Manus and exhibits thereto, the Declaration of Plaintiff Paul
21 Garves, and the pleadings, records and files in the case, and such other further oral and
22 documentary evidence which may be submitted at or before the hearing on this Motion.

23 Dated: May 13, 2026

Respectfully submitted,

24 **D.LAW, INC.**

25
26 By 

Enoch J. Kim
Marta Manus
Attorneys for Plaintiff and on behalf of
himself and all others similarly situated