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Walker, individually, on behalf of themselves, and
all others similarly situated

[Additional Counsel on Next Page]

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

ANDRES SENDIS and TELESE
WALKER, individually, and on behalf of
all others similarly situated,
Plaintiffs,

v.

GUCCI AMERICA, INC., a corporation;
KERING AMERICAS, INC., a
corporation; and DOES 1 through 10,
inclusive,
Defendants.

Case No.: CVPS2404656
Consolidated with Case Nos. CVRI2401710 and
CVRI2407345
Assigned to: Hon. Harold W. Hopp, Dept. 1

Complaint Filed: March 29, 2024
FAC Filed: November 17, 2025
Trial Date: Not set

CLASS & REPRESENTATIVE ACTION

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT
AND MOTION OF ATTORNEYS' FEES,
COSTS AND CLASS REPRESENTATIVE
ENHANCEMENT AWARDS**

FINAL APPROVAL HEARING
Date: May 8, 2026
Time: 8:30 a.m.
Dept.: 1

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT AND AWARD OF ATTORNEYS' FEES AND COSTS**

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Walker, individually, on behalf of themselves, and
9 all others similarly situated
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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on May 8, 2026, at 8:30 a.m., or as soon thereafter as this matter can be heard, in Department 1 of the Riverside Superior Court, located at 4050 Main Street Riverside, CA 92501, Plaintiffs Andres Sendis and Telese Walker (“Plaintiffs”) will and hereby do move this Court for an order granting final approval of the Class Action and PAGA Settlement Agreement (“Settlement Agreement”) by and between Plaintiffs, on behalf of themselves and the conditionally certified Class, and Defendants Gucci America, Inc., and Kering Americas, Inc. (collectively, “Defendants” and together with Plaintiffs, the “Parties”).

Plaintiffs respectfully request that the Court (1) finally approve the Settlement Agreement as fair, adequate, and reasonable; (2) certify the Class for settlement purposes; (3) grant the requested settlement administration expenses to the Settlement Administrator, ILYM Group Inc. (“ILYM”), which has managed the settlement administration; and (4) enter final judgment substantially in the form of the proposed order submitted herewith.

The Settlement has been successfully administered, and good cause exists for granting Final Approval of the Settlement and finding the Settlement and settlement administration expenses to be fair, reasonable, and appropriate.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will and hereby do move this Court for an order awarding (1) Class Counsel’s attorneys’ fee in the amount of \$103,333; Class Counsel’s actual litigation costs of \$25,975.77; and (2) a Class Representative Enhancement Awards of \$10,000 to each Plaintiff, for a total of \$20,000.

This motion is brought pursuant to California Rule of Court 3.769 and California Code of Civil Procedure section 382, and is based on this Notice of Motion and Motion for Final Approval of Class Action and Paga Settlement and Award of Attorneys’ Fees, Costs, and Class Representative Enhancement Awards; the Memorandum of Points and Authorities in support of the Motion; the Declarations of James R. Hawkins and Tyler J. Woods; the Declarations of Plaintiffs Andres Sendis and Teles Walker; the Declaration of Amanda Howard on behalf of ILYM Group Inc.; the Proposed Order Granting Final Approval of Class Action and PAGA Settlement and Judgment; all documents currently on file in this action including without

1 limitation those submitted in support of preliminary approval; the arguments of counsel; and
2 such other and further evidence as the Court may choose to entertain.

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5 Dated: April 15, 2026

JAMES HAWKINS APLC

6 By: 

James R. Hawkins

Christina M. Lucio

Mitchell J. Murray

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9 Attorneys for Plaintiff and the Class

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11 Dated: April 15, 2026

WILSHIRE LAW FIRM

12 By: /s/Tyler J. Woods

13 Tyler J. Woods

James Yoo

14 Heriberto Ponce

15 Ruby Carrera

16 Attorneys for Plaintiffs and the Class
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