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Attorneys for Plaintiff THANH TAM NGUYEN
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

THANH TAM NGUYEN, individually and on
behalf all others similarly situated,

Plaintiffs,

v.

CALIFORNIA MANUFACTURING, INC., a
California corporation, and DOES 1 through
50, inclusive,

Defendants.

Case No. 30-2024-01396529-CU-OE-CXC

Assigned for All Purposes to:
Hon. Randall J. Sherman
Dept.: CX105

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

Date: September 28, 2026
Time: 1:30p.m.

Complaint Filed: April 26, 2024
FAC Filed: July 2, 2024
Trial Date: Not Set

PLEASE TAKE NOTICE that, pursuant to California Rules of Court, rule 3.769 *et seq.*, at a date and time to be set by the Court, in Department CX105 of the Superior Court of the State of California, County of Orange, located at the Civil Complex Center, 751 W. Santa Ana Blvd., Santa Ana, California 92701, Plaintiff Thanh Tam Nguyen (“Plaintiff”), individually and on behalf of the proposed Settlement Class and all Aggrieved Employees, will and hereby does move this Court for an Order:

1. Granting preliminary approval of the proposed Class Action and PAGA Settlement Agreement (“Settlement Agreement”) between Plaintiff and Defendant California Manufacturing, Inc. (“CMI”);
2. Pursuant to section 382 of the California Code of Civil Procedure, and for settlement purposes only, provisionally certifying the Settlement Class, defined as follows: All persons employed by CMI in California in non-exempt positions who worked for CMI during the Class Period (April 27, 2020 to April 30, 2026).
3. Preliminarily appointing Plaintiff Thanh Tam Nguyen as Class Representative;
4. Preliminarily appointing James R. Hawkins, Christina M. Lucio, Mitchell J. Murray, and Samantha A. Jones of James Hawkins APLC as Class Counsel;
5. Appointing Phoenix Class Action Administration Solutions as the third-party Settlement Administrator;
6. Approving the proposed Class Notice and the plan for distribution of the Class Notice to Settlement Class Members; and
7. Scheduling a Final Approval Hearing.

This motion is based on this Notice of Motion, the concurrently filed Memorandum of Points and Authorities, Declaration of James R. Hawkins in Support of Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement Agreement (“Hawkins Decl.”), the Declaration of Plaintiff Thanh Tam Nguyen (“Nguyen Decl.”), the Declaration of Jodey Lawrence, on behalf of Phoenix Class Action Administration Solutions (“Settlement Administrator”), and the pleadings and

1 papers filed in this action, and upon such further oral or documentary evidence and argument as may
2 be presented to the Court at the hearing.

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5 Respectfully submitted,

6 **JAMES HAWKINS APLC**

7 Dated: July 07, 2026

By: 

8 James R. Hawkins, Esq.
9 Christina M. Lucio, Esq.
10 Samantha A. Jones, Esq.

11 Attorneys for Plaintiff
12 Thanh Tam Nguyen on behalf
13 of himself and all other similarly situated
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