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Attorneys for Plaintiff CLAUDIA E. GONZALEZ
on behalf of herself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

CLAUDIA E. GONZALEZ, an individual,
on behalf of herself and others similarly
situated,

Plaintiff,

vs.

THE ANNENBERG FOUNDATION
TRUST AT SUNNYLANDS, a non-profit
entity; and DOES 1 through 50, inclusive,

Defendants.

Case No.: CVRI2401980

CLASS ACTION

Assigned for All Purposes To:
Hon. Harold W. Hopp
Dept.: 1

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

*[Filed concurrently with Memorandum of
Points and Authorities; Declaration of Marta
Manus; Declaration of Claudia E. Gonzalez;
Declaration of Michael Sutherland;
Declaration of Jarrett Gorlick; and
[Proposed] Order]*

Date: August 5, 2025

Time: 8:30 a.m.

Dept.: 1

Reservation: **075110275535**

Original Complaint Filed: April 12, 2024

First Amended Complaint Filed: September 23,
2024

Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on August 5, 2025, at 8:30 a.m. in Department 1 of the
3 Courthouse of the Riverside Superior Court located at 4050 Main Street Riverside, CA 92501,
4 Plaintiff CLAUDIA E. GONZALEZ (“Plaintiff”), on behalf of herself and other similarly situated
5 employees of Defendant THE ANNENBERG FOUNDATION TRUST AT
6 SUNNYLANDS, a non-profit entity (“Defendant”) (collectively, “the Parties”), will and hereby
7 do move this Court pursuant to California Code of Civil Procedure § 382 and California Rule of
8 Court 3.769 for an order as proposed:

- 9 (1) Preliminarily approving the class action settlement reached between Plaintiff and
10 Defendant, including granting preliminary approval of the following class: “all non-
11 exempt, hourly employees that worked for Defendant during the Class Period (April
12 13, 2020, through the date of preliminary approval of the settlement.)”
13 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
14 the class; and
15 (3) Setting the final approval hearing.

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

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

22 Under the terms of the Settlement, the Parties have agreed that all claims brought on
23 behalf of the Class Members shall be fully and finally resolved for the total sum of One Hundred
24 Ninety-Eight Dollars and Zero Cents (\$198,000.00) (“Gross Settlement Amount”) to be paid on a
25 non-reversionary basis. The amount remaining of the Gross Settlement Amount after the
26 following deductions have been made (“Net Settlement Amount”) shall be available for
27 distribution to Class Members who do not opt out of the settlement:

- 28 • not more than Sixty-Six Thousand Dollars and Zero Cents (\$66,000.00) to Class

Counsel for attorneys' fees, and not more than Twenty-Five Thousand Dollars and Zero Cents (\$25,000.00) to Class Counsel for litigation costs;

- not more than Seven Thousand Five Hundred Ninety Dollars and Zero Cents (\$7,500.00) for the settlement administration costs;
- not more than Ten Thousand Dollars and Zero Cents (\$10,000.00) to Plaintiff as a Class Representative Enhancement Award; and
- Ten Thousand Dollars and Zero Cents (\$10,000.00) for civil penalties under the PAGA, where 75% (\$7,500.00) will be paid to the LWDA and 25% (\$2,500.00) will be paid to Class Members for their Individual PAGA Payments.

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

This Notice of Motion and Motion is based on this Notice, and the exhibits thereto (including the Notice to Class Members), the accompanying Memorandum of Points and Authorities, the Declaration of Marta Manus, the Declaration of Claudia E. Gonzalez, the Declaration of Michael Sutherland, the Declaration of Jarrett Gorlick, the Declaration of Robert Bell, the Declaration of David w. Moreshead, the pleadings, records and files in the case, and such other further oral and documentary evidence which may be submitted at or before the hearing on this Motion.

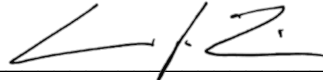
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1 Dated: June 12, 2025

Respectfully submitted,

2 D.LAW, INC.

3
4 By 
5 Emil Davtyan
6 David Yeremian
7 Enoch J. Kim
8 Marta Manus
9 Attorneys for Plaintiff and Settlement Class