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7 Attorneys for Plaintiff MICHAEL GOLDBERG

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

11
12 MICHAEL GOLDBERG, on behalf of the
13 State of California and all Aggrieved
Employees and Class Members,

14 Plaintiff,

15 v.

16
17 GENERAL PRODUCTION SERVICE OF
18 CALIFORNIA, INC., a California
Corporation; and DOES 1-100, inclusive,

19 Defendants.

Case No.: BCV-24-102628

Hon.: T. Mark Smith

Dept. T-2

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

Date: May 29, 2025

Time: 8:30 a.m.

Dept. T-2

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on May 29, 2024, at 8:30 a.m., or as soon thereafter as the
3 matter may be heard, in Department T-2 of the above-captioned Court, located at 3131 Arrow
4 Street, California, plaintiff Michael Goldberg will move the Court for preliminary approval of a
5 proposed class action settlement in the above-captioned action under Cal. Rule of Court 3.769.
6 The terms of the settlement are contained within the Class Action and PAGA Settlement
7 Agreement (“Settlement Agreement”), filed concurrently herewith as Exhibit 1 to the Declaration
8 of Brandon K. Brouillette. In addition, Plaintiff requests that the Court certify the class described
9 in the Settlement Agreement for purposes of settlement only; approve the form of class notice
10 attached as Exhibit A to the Settlement Agreement; approve Crosner Legal P.C. as Class Counsel
11 and plaintiff Michael Goldberg as the Class Representative, approve Phoenix Settlement
12 Administrators as the Settlement Administrator, and set a final approval hearing for October 30,
13 2025, or the first available date on the Court’s calendar thereafter.

14 This motion will be based on this Notice of Motion and Motion, the accompanying
15 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying
16 Declarations of Brandon K. Brouillette, Michael Goldberg, and Jodey Lawrence the Court’s entire
17 file herein, and on such further evidence and argument as may be presented at the hearing.

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19 Dated: May 6, 2025

CROSNER LEGAL, P.C.

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21 By: 
22 Zachary M. Crosner
23 Brandon K. Brouillette
24 Attorneys for Plaintiff Michael Goldberg
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