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Attorneys for Plaintiffs,
NARINE MADATYAN, ARSINEH TOPALIANFARD,
MIKI SUE APODACA, JOANNA GOSLIN, and ELIZABETH HALL
(Additional attorneys for Plaintiffs on following page)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

NARINE MADATYAN, ARSINEH
TOPALIANFARD, MIKI SUE APODACA,
JOANNA GOSLIN, and ELIZABETH
HALL, on behalf of themselves, all others
similarly situated, and as “aggrieved
employees” on behalf of other “aggrieved
employees” under the Labor Code Private
Attorneys General Act of 2004,

Plaintiffs,

vs.

TARLANI CORP., a California corporation;
ALLIANCE HEALTH SERVICES, INC., a
California corporation; MILLENIUM
HEALTHCARE SERVICES, INC.;
MARGARITA TARLANIAN, a natural
person; and ARTHUR TARLANIAN, a
natural person; and DOES 1–50, inclusive,

Defendants

Case No. (Goslin) 24STCV11142
[Related Case No. Madatyan
24STCV16890]

**PLAINTIFFS NARINE MADATYAN,
ARSINEH TOPALIANFARD, MIKI
SUE APODACA, JOANNA GOSLIN,
AND ELIZABETH HALL’S NOTICE
OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Information

Date: July 16, 2026
Time: 10:00 a.m.
Dept: 15
Judge: Hon. Timothy Patrick Dillon

Submitted Under Separate Cover

1. Memorandum of Points and Authorities;
2. Declaration(s) of Louis M. Benowitz; Carly Nese; and Roman Shkodnik; and
3. [Proposed] Order

ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)

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1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on July 16, 2026 at 10:00 a.m., or as soon thereafter as the
3 matter may be heard, in Department 15 of the Los Angeles County Superior Court, located at
4 Spring Street Courthouse, 312 N Spring St., Los Angeles, CA 90012, Plaintiffs Narine Madatyan,
5 Arsineh Topalianfard, Miki Sue Apodaca, Joanna Goslin, and Elizabeth Hall (collectively
6 “Plaintiffs”) will and hereby do move this Court for an order: (1) certifying the below-defined
7 Class solely for settlement purposes pursuant to Code of Civil Procedure § 382; (2) preliminarily
8 approving the First Amended Class Action and PAGA Settlement Agreement and Class Notice
9 (the “Settlement”)¹ between Plaintiffs and Defendants Tarlani Corp., Alliance Health Services,
10 Inc., Millenium Healthcare Services, Inc., Margarita Tarlanian, and Arthur Tarlanian
11 (collectively “Defendants”) (Plaintiff and Defendants are referred to below collectively as the
12 “Parties”), (3) appointing Louis Benowitz (of Benowitz Law Corporation), Carly Nese (of the
13 Law Office of Carly Nese P.C.), and Roman Shkodnik (of D. Law, Inc.) as Class Counsel for the
14 Class; (5) appointing Plaintiffs as the Class Representatives (“Class Representatives”) for the
15 Class; (6) approving the use of the Class Notice and related procedures; (7) directing the mailing
16 of the Class Notice; and (8) scheduling a Final Approval Hearing.

17 The “Class” is defined as “all non-exempt individuals that worked for Defendants in
18 California during the Class Period on an hourly or piece-rate basis. The Class does not include
19 those classified as independent contractors by Defendants.” (Settlement, ¶ 1.5.) The Class Period
20 means one of the following: “1) For employees who were participating class members in the
21 matter of *Stephanie Cuevas v. Tarlani Corp.*, San Bernardino Superior Court, Case No.
22 CIVSB2202953, the class period means April 24, 2023 through September 12, 2025 or 2) For all
23 employees who were not participating class members in the matter of *Cuevas*, who are within the
24 instant Class, the class period means the period from May 2, 2020 to September 12, 2025.”
25 (Settlement, ¶ 1.12.)

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28 ¹ The Settlement is attached as Exhibit 1 to the Declaration of Louis Benowitz (“Benowitz
Decl.”), which is submitted herewith under a separate cover.

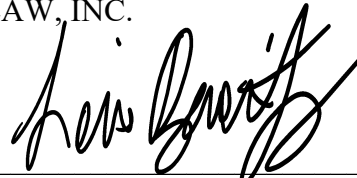
1 This Motion is made on the following grounds: (1) the Class meets all the requirements
2 for class certification for settlement purposes only under Code of Civil Procedure section 382;
3 (2) Plaintiffs and their counsel are adequate to represent the Class; (3) the Settlement reflects a
4 fair, adequate, and reasonable compromise of all disputed claims in view of Defendants' potential
5 exposure as weighed against the risks of continued litigation; (4) the Class Notice and related
6 procedures adequately apprise the Class Members of their rights under the Settlement and fully
7 comport with due process; and (5) in view of the foregoing, notice should be disseminated to the
8 Class Members and a Final Approval Hearing should be set.

9 The Motion is based on this Notice of Motion and Motion, the attached Memorandum of
10 Points and Authorities, the Declarations of Louis Benowitz, Carly Nese, and Roman Shkodnik,
11 and all exhibits thereto, all papers and pleadings on file with the Court in this action, all matters
12 judicially noticeable, and on such oral and documentary evidence as may be presented in
13 connection with the hearing on the Motion.

14 Respectfully submitted,
15 BENOWITZ LAW CORPORATION
16 LAW OFFICE OF CARLY NESE
17 D.LAW, INC.

18 Dated: April 24, 2026

19 BY



20 LOUIS BENOWITZ
21 CARLY NESE
22 ROMAN SHKODNIK
23 Attorneys for Plaintiffs
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PROOF OF SERVICE

State of California,
County of Los Angeles

1. I am a citizen of the United States and am employed in the County of Los Angeles, State of California. I am over the age of 18 years, and not a party to the within action. My business address is 8605 Santa Monica Boulevard, PMB 79183, West Hollywood, CA 90069.
2. On April 25, 2026, I served the foregoing document(s) described as **PLAINTIFFS NARINE MADATYAN, ARSINEH TOPALIANFARD, MIKI SUE APODACA, JOANNA GOSLIN, AND ELIZABETH HALL'S NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on interested parties by transmitting it in the manner(s) described below:

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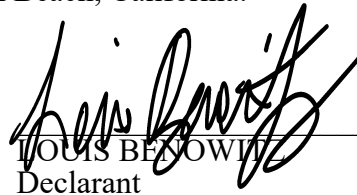
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XXXX BY EMAIL I transmitted a PDF version of this document by electronic mail to the person(s) indicated using the email address(es) indicated.

XXXX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

EXECUTED on April 25, 2026, at Manhattan Beach, California.


LOUIS BENOWITZ
Declarant