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Attorneys for Plaintiff VALERY DO, on behalf of
herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

VALERY DO on behalf of herself and
all others similarly situated, and the
general public,

Plaintiff,

v.

RECOR MEDICAL, INC., a Delaware
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 24CV441617

CLASS ACTION

*[Assigned for all purposes to the Hon. Theodore
C. Zayner, Dept. 19]*

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

*[Filed concurrently with Memorandum of Points and
Authorities; Declaration of David Keledjian; and
[Proposed] Order Granting Plaintiffs' Motion for
Final Approval]*

Date: December 17, 2025

Time: 1:30 PM

Dept.: 19

Original Complaint Filed: June 21, 2024

First Amended Complaint Filed: August 23, 2024

Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on December 17, 2025, at 1:30 p.m. in Department 19 of the
3 Courthouse of the Santa Clara Superior Court located at 161 N. First Street, Santa Clara, CA, 95113,
4 Plaintiff VALERY DO (“Plaintiff”), on behalf of herself and other similarly situated employees of
5 Defendant RECOR MEDICAL, INC. (“Defendant”) (hereinafter Plaintiff and Defendant
6 collectively referred to as the “Parties”), will and hereby do move this Court pursuant to California
7 Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order of final approval of
8 the class action settlement, which will accomplish the following: certify the class for settlement
9 purposes only; approve the class action settlement embodied in the Parties’ Joint Stipulation of
10 Class Action and PAGA Settlement and Release (“Settlement Agreement”) (“Settlement
11 Agreement” or “Settlement”); confirm Plaintiff as Class Representatives; confirm the appointment
12 of Class Counsel; approve Class Counsel’s application for attorney’s fees and litigation costs;
13 approve the enhancement award to each Class Representative; and enter judgment approving the
14 class action settlement.

15 The grounds for this Motion, as set forth in the attached memorandum of points and
16 authorities and supporting declarations, are that this is a fair and reasonable settlement that benefits
17 the class and was the product of informed, non-collusive negotiations by parties who were
18 represented by experienced and able counsel. See *Dunk v. Ford Motor Co.*, 48 Cal. App. 4th 1794,
19 1802 (1996); Manual for Complex Litigation, (Second), § 30.44 (1985).

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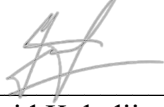
1 Plaintiff bases this Motion on this Notice and the accompanying Memorandum of Points
2 and Authorities, the Declarations of David Keledjian and Lluvia Islas, the complete pleadings,
3 records, and files in the case, and such other further oral and documentary evidence which may be
4 submitted at or before the hearing on this Motion.

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6 Dated: November 21, 2025

Respectfully submitted,

7 D.LAW, INC.

8
9 By


10 David Keledjian
11 David Arakelyan
12 Attorneys for Plaintiff VALERY DO on
13 behalf of herself and others similarly situated
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