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Attorneys for Plaintiff REBECCA URQUIZO,  
on behalf of herself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF MONTEREY**

REBECCA URQUIZO, on behalf of herself  
and others similarly situated,

Plaintiff,

vs.

BOYS & GIRLS CLUBS OF MONTEREY  
COUNTY, a California non-profit  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No.: 24CV002929

CLASS ACTION

Assigned for All Purposes To:  
Hon. Thomas W. Wills  
Dept.: 15

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

*[filed concurrently with Memorandum of Points  
and Authorities; Declarations of Enoch J. Kim,  
Michael Sutherland, Jarrett Gorlick, and  
Rebecca Urquizo; and [Proposed] Order]*

Date: December 12, 2025  
Time: 08:30 a.m.  
Dept.: 15

Original Complaint filed: July 12, 2024  
First Amended Complaint: August 26, 2024  
Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on December 12, 2025, at 08:30 a.m. in Department 15 of the  
3 Monterey County Superior Court located at 1200 Aguajito Road, Monterey, CA 93940, Plaintiff  
4 Rebecca Urquizo (“Plaintiff”), on behalf of herself and other similarly situated employees of  
5 Defendant Boys & Girls Clubs of Monterey County (“Defendant”) (collectively, “the Parties”), will  
6 and hereby moves this Court pursuant to California Code of Civil Procedure § 382 and California  
7 Rule of Court 3.769 for an order as proposed:

8 1. Preliminarily approving the proposed class-wide settlement of this action as set forth  
9 in the Parties’ Class Action and PAGA Settlement Agreement (“Settlement Agreement” or  
10 “Settlement”), which is attached as **Exhibit 1** to the Declaration of Enoch J. Kim (“Kim Decl.”),  
11 filed concurrently herewith;

12 2. Approving the form and method for providing notice to the Class Members and  
13 approving the form and content of the Parties’ proposed Court Approved Notice of Class Action  
14 Settlement and Hearing Date for Final Court Approval (“Class Notice”) for sending to the Class  
15 Members (provided at **Exhibit A** to the Settlement Agreement);

16 3. Approving for mailing the Court approved Class Notice and directing that it be sent  
17 to the Class Members;

18 4. Appointing Plaintiff Rebecca Urquizo as Class Representative for settlement  
19 purposes only;

20 5. Appointing Emil Davtyan, David Yeremian, Enoch J. Kim, and Arianna N. Razi of  
21 D.Law, Inc. as Class Counsel for settlement purposes only.

22 6. Scheduling a Final Approval hearing date to consider the Parties’ request for Final  
23 Approval of the proposed Settlement and Plaintiff’s application for Class Counsel Fees Payment to  
24 Class Counsel for attorneys’ fees, Class Counsel Litigation Expenses Payment to Class Counsel for  
25 reasonable expenses incurred in connection with this Action, and Class Representative Service  
26 Payment to Plaintiff for her services in this Action.

27 7. Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed  
28 settlement’s allocation of funds to claims made under Labor Code §§ 2698, *et seq.*, the Private

1 Attorneys General Act of 2004 (“PAGA”).

2 This Motion is made on the grounds that, after good-faith, arm’s-length negotiations, the  
3 Parties have agreed upon a Settlement which is fair, reasonable, and adequate and in the best  
4 interests of the Class and all Parties. Defendant does not oppose the Motion. This Notice of Motion  
5 and Motion is also based on the fact that this Settlement was the product of informed, non-collusive  
6 negotiations by the Parties, who were represented by experienced and able counsel. *See Dunk v.*  
7 *Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second  
8 (1985) § 30.44. The proposed Settlement meets the legal standard for preliminary approval and is  
9 in the best interests of the Class; the proposed form of notice explains the Settlement terms in a clear  
10 and straightforward manner; the proposed procedures for notice provide the best practical notice to  
11 the Class; and Class Members will have an opportunity to participate in and/or object to the  
12 Settlement and/or opt-out of the Settlement.

13 This Motion is based upon this Notice of Motion, the accompanying Memorandum of Points  
14 and Authorities, the Declaration of Class Counsel Enoch J. Kim, the Declarations of Michael  
15 Sutherland, Jarrett Gorlick, and Plaintiff Rebecca Urquizo submitted with this Motion, the  
16 [Proposed] Order Granting Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA  
17 Settlement Agreement, the Court’s record of this action, all matters of which the Court may take  
18 notice, and upon such oral or documentary evidence as the Court may receive at or before the hearing  
19 on this unopposed Motion.

20  
21 DATED: November 18, 2025

D.LAW, INC.

22  
23 By



Emil Davtyan  
David Yeremian  
Enoch J. Kim  
Arianna N. Razi  
Attorneys for Plaintiff and Class