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Attorneys for Plaintiff Joseph Stevens,
on behalf of himself and all others similarly situated and aggrieved

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN BERNARDINO

JOSEPH STEVENS, on behalf of himself
and all others similarly situated and
aggrieved,

Plaintiff,

v.

GOSHARE INC., a Delaware Corporation;
and DOES 1 Through 10, inclusive,

Defendants.

Case No. CIVSB2428568
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Wilfred J. Schneider Jr.
Department S32

CLASS AND REPRESENTATIVE ACTION

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

Date: January 6, 2026

Time: 8:30 a.m.

Dept.: S32

Complaint filed: October 3, 2024

Trial Date: Not set

1 PLEASE TAKE NOTICE, on January 6, 2026, at 8:30 a.m., or as soon as the matter may
2 be heard in Department S32 of the above-captioned court, located at 247 West Third Street, San
3 Bernardino, California, 92415, the Honorable Wilfred J. Schneider Jr. presiding, Plaintiff Joseph
4 Stevens, on behalf of himself and others similarly situated and aggrieved, will move this Court
5 for an Order:

6 1. Preliminarily approving the Class and PAGA Representative Action Settlement as
7 fair, adequate, and reasonable based upon the terms set forth in the Class Action and PAGA
8 Settlement Agreement (“Agreement”), including payment by Defendant Goshare Inc. of the
9 Gross Settlement Amount of \$250,000.00;

10 2. Conditionally certifying the case as a class action for settlement purposes only;

11 3. Approving the Court Approved Notice of Class Action Settlement and Hearing
12 Date For Final Court Approval (“Class Notice”) to be mailed to all Settlement Class Members
13 advising them of the pendency of Class Action, proposed Settlement, manner and procedure to
14 submit requests for exclusion and objections to the Settlement, automatic payment of their share
15 of the Net Settlement Amount without the need to return a claim form, date set for the Final
16 Approval hearing, and of the right to appear at the Hearing;

17 4. Appointing Isam C. Khoury and Rosemary C. Khoury of Cohelan Khoury &
18 Singer, and Christopher J. Hamner of Hamner Law Offices, APLC, as Class Counsel;

19 5. Appointing Plaintiff Joseph Stevens as Class Representative;

20 6. Appointing ILYM Group, Inc. as the Administrator; and

21 7. Setting a hearing date to consider final approval of the Settlement.

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1 This motion is made based on this Notice; Points and Authorities; Declarations of Class
2 Counsel Isam C. Khoury and Christopher J. Hamner, Class Representative Joseph Stevens, and
3 ILYM Representative Lisa Mullins; the Agreement; [Proposed] Order Granting Motion for
4 Preliminary Approval of Class and PAGA Representative Action Settlement; the Court's files;
5 and such other evidence the Court may consider.

6 Respectfully submitted,

7 COHELAN KHOURY & SINGER
8 HAMNER LAW OFFICES, APLC

9 Dated: November 7, 2025

By: 
Isam C. Khoury

Rosemary C. Khoury

10 Attorneys for Plaintiff JOSEPH STEVENS, on
11 behalf of himself and all others similarly situated
12 and aggrieved