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on behalf of herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

KIMBERLY JIMENEZ, on behalf of herself and others similarly situated, Plaintiff, vs. QUADIENT, INC., a Delaware corporation; and DOES 1 through 50, inclusive, Defendants.	CLASS ACTION Case No. 30-2024-01408972-CU-OE-CXC Judge: Hon. David A. Hoffer Department: CX103 **PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR AN ORDER (1) PRELIMINARILY APPROVING THE CLASS ACTION SETTLEMENT; (2) APPROVING NOTICE OF CLASS ACTION SETTLEMENT; AND (3) SETTING HEARING FOR FINAL APPROVAL** *[filed concurrently with Plaintiff's Memorandum of Points and Authorities; Declaration of Marta Manus; Declaration of Kimberly Jimenez; and [Proposed] Order]* Date: November 30, 2026 Time: 1:30 p.m. Dept.: CX103 **Reservation Number: 74972415**

TO THE COURT AND DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on November 30, 2026, at 1:30 p.m., or as soon thereafter as this matter may be heard in Department CX103 of the Orange County Superior Court, located at the Civil Complex Center, 751 West Santa Ana Blvd., Santa Ana, CA 92701, Plaintiff Kimberly Jimenez ("Plaintiff"), on behalf of herself and all persons similarly situated, will and hereby moves this Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order:

(1) Preliminarily approving the class action settlement reached between Plaintiff and Defendant Quadient, Inc. ("Defendant" collectively with Plaintiff, "the Parties"), including granting preliminary approval of the following class: as all hourly, non-exempt employees who work/worked for Defendants in California during the class release and PAGA release periods. The Class Period is the period from June 21, 2020, through August 31, 2025;

(2) Approving the form of Notice of Class Action Settlement and procedure for notice to the class; and

(3) Setting the final approval hearing.

Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed settlement's allocation of funds to claims made under the Labor Code Private Attorneys General Act of 2004 ("PAGA").

Pursuant to the proposed Class Action and PAGA Settlement Agreement ("Settlement" or "Settlement Agreement"), filed concurrently herewith, Defendants do not oppose the preliminary approval of the class action settlement.

Under the terms of the Settlement, the Parties have agreed that all claims brought on behalf of the Class Members shall be fully and finally resolved for the total sum of $505,000.00 ("Gross Settlement Amount") to be paid on a non-reversionary basis. The amount remaining of the Gross Settlement Amount after the following deductions have been made ("Net Settlement Amount") shall be available for distribution to Class Members who do not opt out of the settlement:

- not more than Five Thousand Dollars ($7,500.00) to the Class Representative for a Enhancement Payment;
- not more than One Hundred and Sixty Eight Thousand Three Hundred and Thirty Three Dollars ($168,333.00) to Class Counsel for attorneys' fees, and no more than Twenty-Five Thousand Dollars ($25,000.000) for litigation costs;
- up to $7,490.00 for the Class Action Administration Costs; and,
- $50,000 for civil penalties under the PAGA, where 65% ($32,500) will be paid to the LWDA and 35% ($17,500) will be distributed to PAGA Members).

This Notice of Motion and Motion is based on the fact that this is a fair and reasonable settlement that benefits the class and was the product of informed, non-collusive negotiations by the parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44. The proposed settlement meets the legal standard for preliminary approval and is in the best interests of the class; the proposed form of notice explains the settlement terms in a clear and straightforward manner; the proposed procedures for notice provide the best practical notice to the class; and that Class Members will have an opportunity to participate in and/or object to the settlement and/or opt-out of the settlement.

This Notice of Motion and Motion is based on this Notice, and the exhibits thereto (including the Notice to Class Members), the accompanying Memorandum of Points and Authorities, the Declaration of Marta Manus and exhibits thereto, the Declaration of Kimberly Jimenez, the pleadings, records and files in the case, and such other further oral and documentary evidence which may be submitted at or before the hearing on this Motion.

Dated: October 1, 2026

D.LAW, INC.

By _____
Marta Manus
Attorneys for Plaintiff, Kimberly Jimenez, on behalf of herself and others similarly situated