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on behalf of herself and all others similarly situated

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

JULIE M. BARDELMEIER, an individual,
on behalf of herself and others similarly
situated,

Plaintiff,

vs.

LAND OCEAN, INC., a California
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: S-CV-0052963

CLASS ACTION

Assigned for All Purposes To:
Department: 42

**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,
Lisa Mullins, and Julie M. Bardelmeier; and
[Proposed] Order]*

Date: April 28, 2026
Time: 8:30 a.m.
Dept.: 42

Original Complaint Filed: June 6, 2024
First Amended Complaint Filed: April 7, 2025
Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on April 28, 2026 at 8:30 a.m. in Department 42 of the Placer
3 County Superior Court located at 10820 Justice Center Drive, Roseville, CA 95678, Plaintiff Julie M.
4 Bardelmeier (“Plaintiff”), on behalf of herself and other similarly situated employees of Defendant
5 Land Ocean, Inc. (“Defendant”) (collectively, “the Parties”), will and hereby move this Court
6 pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order
7 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”), which is
10 attached as **Exhibit 1** to the Declaration of Enoch J. Kim (“Kim Decl.”), filed concurrently herewith;

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

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

17 4. Appointing Plaintiff Julie M. Bardelmeier as Class Representative for settlement
18 purposes only;

19 5. Appointing D.Law, Inc. as Class Counsel for settlement purposes only;

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

25 7. Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed
26 settlement’s allocation of funds to claims made under Labor Code §§ 2698, *et seq.*, the Private
27 Attorneys General Act of 2004 (“PAGA”).

28 This Motion is made on the grounds that, after good-faith, arm’s-length negotiations, the

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

11 This Motion is based upon this Notice of Motion, the accompanying Memorandum of Points
12 and Authorities, the Declaration of Class Counsel Enoch J. Kim, the Declarations of Lisa Mullins and
13 Plaintiff Julie M. Bardelmeier submitted with this Motion, the [Proposed] Order Granting Plaintiff's
14 Motion for Preliminary Approval of Class Action and PAGA Settlement Agreement, the Court's
15 record of this action, all matters of which the Court may take notice, and upon such oral or
16 documentary evidence as the Court may receive at or before the hearing on this unopposed Motion.

17
18 DATED: December 19, 2025

D.LAW, INC.

19
20 By



David Yeremian
Alvin B. Lindsay
Jean Hopkins Power
Enoch J. Kim
Arianna N. Razi
Attorneys for Plaintiff and Class