

Nicholas J. Ferraro (State Bar No. 306528)
Lauren N. Vega (State Bar No. 306525)
Andrew T. Katseanes (State Bar No. 351638)
Ferraro Vega Employment Lawyers, Inc.
3333 Camino del Rio South, Suite 300
San Diego, California 92108
(619) 693-7727 main / (619) 350-6855 facsimile
nick@ferrarovega.com / lauren@ferrarovega.com /
andrew@ferrarovega.com

Attorneys for Plaintiff Stephen Armas

(Additional Counsel on following page)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

STEPHEN ARMAS and JOSE ISRAEL
JERONIMO BRAN, as individuals and on
behalf of others similarly situated and the State
of California under the Private Attorneys
General Act,

Plaintiffs,

vs.

JJ&S ASBESTOS REMOVAL, INC., and
DOES 1 through 50, inclusive,

Defendants.

Case No. 24CU000405C

Hon. Blaine K. Bowman
Dept. 74

CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Motion for Prelim. App. Hearing:

Date: May 15, 2026

Time: 8:30 a.m.

[Filed concurrently with Plaintiffs' Memorandum
of Points and Authorities, Declaration of Nicholas
J. Ferraro, Declaration of Paul K. Haines,
Declaration of Scott M. Lidman, Declaration of
Jodey Lawrence of Phoenix Settlement
Administrators in Support, and [Proposed] Order]

Action Filed: July 10, 2024

1 HAINES LAW GROUP, APC
2 Paul K. Haines (SBN 248226)
3 phaines@haineslawgroup.com
4 2155 Campus Drive, Suite 180
5 El Segundo, California 90245
6 Tel: (424) 292-2350
7 Fax: (424) 292-2355

8 *Attorneys for Plaintiff Josue Israel Jeronimo Bran*

9 LIDMAN LAW, APC
10 Scott M. Lidman (SBN 199433)
11 slidman@lidmanlaw.com
12 Milan Moore (SBN 308095)
13 mmoore@lidmanlaw.com
14 Tiara Gose-Hardy (SBN 323823)
15 tgose@lidmanlaw.com
16 2155 Campus Drive, Suite 150
17 El Segundo, California 90245
18 Tel: (424) 322-4772
19 Fax: (424) 322-4775

20 *Attorneys for Plaintiff Josue Israel Jeronimo Bran*

1 **PLEASE TAKE NOTICE** that on May 15, 2026, at 8:30 a.m., or as soon thereafter as may be
2 heard in Department 74 of the above-captioned court, located at 330 W. Broadway, San Diego,
3 California 92101, the Honorable Blaine K. Bowman presiding, Plaintiffs Stephen Armas and Josue
4 Israel Jeronimo Bran ("Plaintiffs"), individually and on behalf of the putative class, will and hereby do
5 move this Court to sign the concurrently filed [Proposed] Order Granting Preliminary Approval of Class
6 Action Settlement:

7 1. Preliminarily approving the proposed class action and PAGA settlement memorialized
8 in the executed class action settlement agreement attached to the Declaration of Nicholas J. Ferraro as
9 Exhibit 1-A ("Settlement"), including Defendant's non-revisionary payment of the Gross Settlement
10 Amount of \$310,000, as fair, adequate, and reasonable;

11 2. Preliminarily approving (subject to proof at the time of the final approval hearing)
12 payment of reasonable attorneys' fees and litigation costs from the Gross Settlement Amount of up to
13 35% of the Gross Settlement Amount and litigation costs up to \$25,000;

14 3. Preliminarily approving (subject to proof in the form of declarations from the named
15 Plaintiffs at the time of the final approval hearing), a total service awards of \$20,000, (\$10,000 to
16 Plaintiff Armas and \$10,000 to Plaintiff Jeronimo Bran) payable to Plaintiffs as compensation for the
17 burdens, responsibilities, time, effort, risks, and initiative involved in representing the class, and the
18 benefits conferred on absent class members;

19 4. Preliminarily approving the PAGA payment to the California Labor and Workforce
20 Development Agency of \$13,000 (representing 65% of the \$20,000 PAGA Payment);

21 5. Conditionally certifying the class for settlement purposes only;

22 6. Appointing Stephen Armas and Josue Israel Jeronimo Bran as the class representatives
23 and Ferraro Vega Employment Lawyers, Inc., Haines Law Group, APC and Lidman Law, APC as class
24 counsels;

25 7. Approving the class notice attached as to the Settlement, for distribution to the class
26 pursuant to the notice procedure, which sets forth the manner and method for submitting a request for
27 exclusion and making an objection to the settlement; the automatic payment of each class member's
28

share of the settlement funds without the need to return a claim form; the date set for the final approval hearing; and right for class members to appear at the final approval hearing;

8. Preliminarily approving Phoenix Settlement Administrators as the settlement administrator, and further approving distribution of an estimate of up to \$8,250 to cover its expenses in providing notice to the class and administering the settlement; and

9. Setting a final fairness hearing to consider final approval of the proposed settlement.

This motion is based on the following submissions, along with any other documents, evidence, authorities, or argument which the Court may consider when ruling on this motion:

1. Notice of Motion and Motion for Preliminary Approval of Class Action Settlement;
2. Memorandum of Points and Authorities;
3. Declaration of Nicholas J. Ferraro, including Exhibits;
4. Declaration of Paul K. Haines;
5. Declaration of Scott M. Lidman;
6. Declaration of Jodey Lawrence of Phoenix Settlement Administrators; and
7. Proposed Order.

Plaintiffs provide further notice that Defendant does not intend to oppose this motion.

Respectfully submitted,

Dated: April 23, 2026

Ferraro Vega Employment Lawyers, Inc.



Nicholas J. Ferraro

Lauren N. Vega

Andrew T. Katseanes

*Attorneys for Plaintiffs Stephen Armas and
Josue Israel Jeronimo Bran*