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Attorneys for Plaintiff ANA VALENZUELA,
individually, and on behalf of other similarly
situated employees and aggrieved employees
pursuant to the California Private Attorneys General Act

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

ANA VALENZUELA, individually, and on
behalf of other similarly situated employees
and aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

HANDLERY HOTELS, INC.; and DOES
through 25, inclusive,

Defendants.

Case No. 24CU006128C

Honorable Euketa Oliver
Department C-75

RE-NOTICE OF MOTION

Date: April 24, 2026
Time: 9:00 a.m.
Dept.: C-75

Complaint Filed: August 15, 2024
FAC Filed: November 17, 2025
Trial Date: Not Set

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on **April 24, 2026 at 9:00 a.m.** in Department C-75 of the above-captioned Court located at 330 West Broadway, San Diego, California 92101, pursuant to California Code of Civil Procedure section 382 and Rule 3.769 of the California Rules of Court, Plaintiff Ana Valenzuela (“Plaintiff”) will and hereby does move the Court for an Order granting preliminary approval of the proposed class action and PAGA settlement between Plaintiff and Defendant Handlery Hotels, Inc. (“Defendant”).

Plaintiff requests that the Court enter an Order:

1. Preliminarily approving the Joint Stipulation of Class Action and PAGA Settlement (“Settlement” or “Settlement Agreement”) attached as Exhibit 3 to the Declaration of Alexandra Rose in Support of Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement (“Rose Decl.”);
2. Certifying the Class for Settlement purposes;
3. Appointing Plaintiff Ana Valenzuela as the Class Representative for Settlement purposes;
4. Appointing Jonathan M. Genish, Miriam L. Schimmel, Joana Fang, Alexandra Rose, and James S. Winn Jr. of Blackstone Law, APC as Class Counsel for Settlement purposes;
5. Approving the proposed Notice of Class Action Settlement (“Class Notice”), attached as Exhibit A to the Settlement Agreement, to be mailed to the Class;
6. Approving the opt-out and objection procedures provided in the Settlement Agreement and set forth in the Class Notice;
7. For each Class Member, directing Defendant to furnish their (1) full name; (2) last known mailing address; (3) Social Security number; (4) dates worked for Defendant during the Class Period; and (5) such other information as is necessary for the Settlement Administrator to calculate Workweeks and Pay Periods to the Settlement Administrator within twenty-eight (28) calendar days after entry of the order granting preliminary approval of the Settlement;
8. Approving the proposed deadlines for the settlement administration process; and
9. Setting a Final Approval Hearing.

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1 Pursuant to California Labor Code section 2699(1)(2), on November 5, 2025, a copy of the
2 Settlement was submitted to the California Labor and Workforce Development Agency (“LWDA”) via
3 online submission through the LWDA’s website. (Rose Decl., ¶ 46 and Exh. 4).

4 This Motion is based upon this Notice, the attached Memorandum of Points and Authorities, the
5 Declaration of Alexandra Rose, the Declaration of Plaintiff Ana Valenzuela, the Declaration of the
6 Settlement Administrator (Lisa Mullins of ILYM Group Inc.), the pleadings and other records on file
7 with the Court in this matter, and any other further evidence or argument that the Court may properly
8 receive at or before the hearing.

9 Respectfully submitted,

10 Dated: February 26, 2026

BLACKSTONE LAW, APC

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12 By: /s/ James S. Winn Jr.
13 Alexandra Rose
14 James S. Winn Jr.
15 Attorneys for Plaintiff Ana Valenzuela
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I, Lorena Bautista, certify and declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 8383 Wilshire Blvd, Suite 745, Beverly Hills, California 90211. On February 26, 2026, I served a copy of the following document(s):

- **RE-NOTICE OF MOTION**

on the interested parties as follows:

Andrew J. Davis
ddavis@folgerlevin.com
FOLGER LEVIN LLP
33 New Montgomery Street, 19th Floor
San Francisco, California 94105
Tel: (415) 625-1050 / Fax: (415) 625-1091

Attorneys for Defendant HANDLERY HOTELS, INC.

☒ **BY ELECTRONIC MAIL (E-MAIL):** I caused said document(s) to be delivered electronically to be delivered to the above referenced addressee(s) via email from email address lbautista@blackstonepc.com pursuant to California Code of Civil Procedure section 1010.6(e)(1). I did not receive any electronic message or other indication that the transmission was unsuccessful.

☒ **BY ONLINE SUBMISSION:** The above-referenced documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(I). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on February 26, 2026 at Beverly Hills, California.

/s/ Lorena Bautista
Lorena Bautista