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Attorneys for Plaintiff JESSE CROWELL,
on behalf of himself and all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO – COMPLEX LITIGATION**

JESSE CROWELL, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

PENTAIR COMMERCIAL SERVICES, LLC,
a Delaware limited liability company; and Does
1 to 50, inclusive,

Defendants.

CLASS ACTION

Case No. CGC-24-617790

Honorable Ethan P. Schulman
Department 304

**NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: December 3, 2025

Time: 9:00 a.m.

Dept.: 304

Action filed: September 3, 2024

First Amended Complaint: November 8, 2024

Trial date: None Set

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

2 PLEASE TAKE NOTICE that on December 3, 2025 at 9:00 a.m. in Department 304 of the
3 Courthouse of the San Francisco Superior Court located at 400 McAllister Street, San Francisco,
4 CA 94102, Plaintiff JESSE CROWELL (“Plaintiff”), on behalf of himself and other similarly
5 situated employees of Defendant PENTAIR COMMERCIAL SERVICES, LLC (“Defendant”)
6 will and hereby do move this Court pursuant to California Code of Civil Procedure § 382 and
7 California Rule of Court 3.769 for an order as proposed:

- 8 (1) Preliminarily approving the class action settlement reached between Plaintiff and
9 Defendant, including granting preliminary approval of the following class: “all
10 persons employed by Defendant in California as non-exempt employees at any point
11 from August 6, 2020, through May 5, 2025 (the “Class Period”).”
12 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
13 the Class; and
14 (3) Setting the final approval hearing.

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

18 Pursuant to the proposed Class Action and PAGA Settlement Agreement (“Settlement” or
19 “Settlement Agreement”), filed concurrently herewith, Defendant does not oppose the
20 preliminary approval of the class action settlement.

21 Under the terms of the Settlement, the Parties have agreed that all claims brought on
22 behalf of the Class Members shall be fully and finally resolved for the total sum of Two Hundred
23 Eighty-Five Thousand Dollars and Zero Cents (\$285,000.00) (“Gross Settlement Amount”) to be
24 paid on a non-reversionary basis. The amount remaining of the Gross Settlement Amount after
25 the following deductions have been made (“Net Settlement Amount”) shall be available for
26 distribution to Class Members who do not opt out of the settlement:

- 27 • Up to one-third of the GSA, or \$95,000.00, to Class Counsel for attorneys’ fees,
28 and up to \$28,000.00 to Class Counsel for reimbursement of reasonable expenses

1 incurred to prosecute the Action;

- 2 • Up to \$8,974.00 to the Administrator for its fees and costs to administer the
3 Settlement
4 • Up to \$15,000.00 to the named Plaintiff as an enhancement award for service as
5 the class representative; and
6 • \$20,000.00 for settlement of claims for civil penalties under PAGA, with 35%
7 allocated to the Aggrieved Employees (\$7,000.00) and 65% allocated to the
8 LWDA (\$13,000.00) will be paid to the LWDA.

9 This Notice of Motion and Motion is based on the fact that this is a fair and reasonable
10 settlement that benefits the class and was the product of informed, non-collusive negotiations by
11 the parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.*
12 (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44.
13 The proposed settlement meets the legal standard for preliminary approval and is in the best
14 interests of the class; the proposed form of notice explains the settlement terms in a clear and
15 straightforward manner; the proposed procedures for notice provide the best practical notice to
16 the class; and that Class Members will have an opportunity to participate in and/or object to the
17 settlement and/or opt-out of the settlement.

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

23 Dated: November 6, 2025

Respectfully submitted,

24 **D.LAW, INC.**

25
26 By



Enoch J. Kim
Marta Manus
Attorneys for Plaintiff and on behalf of
himself and all others similarly situated