

**D.LAW, INC.**  
Roman Shkodnik (SBN 285152)  
Mason Doidge (SBN 352604)  
Enoch J. Kim, Esq. (SBN 261146)  
Bradford Smith, Esq. (SBN 345879)  
250 N Madison Avenue, 2<sup>nd</sup> Floor  
Pasadena, CA 91101-1639  
Tel.: (818) 962-6465 / Fax: (818) 962-6469  
Emails: [R.Shkodnik@d.law](mailto:R.Shkodnik@d.law), [M.Doidge@d.law](mailto:M.Doidge@d.law),  
[E.Kim@d.law](mailto:E.Kim@d.law), [B.Smith@d.law](mailto:B.Smith@d.law)

Attorneys for Plaintiff JESSICA AGUILAR,  
on behalf of herself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

JESSICA AGUILAR, an individual on  
behalf of herself and all others similarly  
situated,

Plaintiffs,

v.

EC GROUP INC dba DENNIS & LEEN  
dba FORMATIONS, a California  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

**CLASS ACTION**

Case No. 24STCV25866

Assigned for All Purposes To:  
Honorable Laura A. Seigle  
Dept. 17

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

*[Filed concurrently with Memorandum of  
Points and Authorities; Declarations of  
Enoch J. Kim, Jessica Aguilar, Sean  
Hartranft; and [Proposed] Order Granting  
Plaintiff's Motion for Preliminary  
Approval]*

Hearing Information:

Date: May 29, 2026  
Time: 9:00 a.m.  
Dept: 17

Action filed: October 4, 2024  
FAC Filed: December 9, 2024  
Trial date: None Set

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

PLEASE TAKE NOTICE that on May 29, 2026, at 9:00 a.m. in Department 17 of the Los Angeles Superior Court located at 111 North Hill Street, Los Angeles, CA 90012, Plaintiff Jessica Aguilar (“Plaintiff”), on behalf of herself, and other similarly situated employees of Defendant E.C. Group Inc., a California corporation doing business as “Dennis & Leen” and “Formations” (“Defendant”) (collectively, “the Parties”), will and hereby does move this Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order as proposed:

1. Preliminarily approving the proposed class-wide settlement of this action as set forth in the Class Action and PAGA Settlement Agreement (“Settlement Agreement”), which is attached as Exhibit 1 to the Declaration of Enoch J. Kim (“Kim Decl.”), filed herewith;

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

3. Approving for mailing the Class Notice packet, consisting of the Court approved Class Notice and directing that it be sent to the Class Members;

4. Appointing Plaintiff Jessica Aguilar as Class Representative for settlement purposes only;

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

6. Scheduling a Final Approval hearing date to consider the Parties’ request for Final Approval of the proposed Settlement and Plaintiff’s application for Attorneys’ Fees and Costs Awards to Class Counsel for attorneys’ fees and reasonable expenses incurred in connection with this Action, and Class Representative Service Payment to Plaintiff for her service in this Action.

7. 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 Labor Code §§ 2698, *et seq.*, the Private Attorneys General Act of 2004 (“PAGA”).

Under the terms of the Settlement, the Parties have agreed that all claims brought on

1 behalf of the Class Members shall be fully and finally resolved for the total sum of \$450,000.00  
2 (“Gross Settlement Amount”) to be paid on a non-reversionary basis. The amount remaining of  
3 the Gross Settlement Amount after the following deductions have been made (“Net Settlement  
4 Amount”) shall be available for distribution to Class Members who do not opt out of the  
5 Settlement:

- 6 • Up to one-third of the Gross Settlement Amount, or **\$150,000.00**, to Class  
7 Counsel as attorneys’ fees for the litigation and resolution of this Action and  
8 actual costs incurred in this Action;
- 9 • A not-to-exceed amount of **\$6,990.00** to the Settlement Administrator for its costs  
10 of administration of the Settlement;
- 11 • Up to **\$5,000.00** to Plaintiff as an award for her service as a class representative  
12 and in exchange for a General Release of all Claims against Defendant and the  
13 Released Parties; and
- 14 • **\$35,000.00** for settlement of claims for civil penalties under PAGA, with 35%  
15 (\$12,250.00) allocated to the PAGA Members (“Individual PAGA Payments”)  
16 and 65% (\$22,750.00) allocated to the LWDA (“LWDA PAGA Payment”).

17 This Motion is made on the grounds that after good-faith, arm’s length negotiations, the  
18 Parties have agreed upon a Settlement which is fair, reasonable, and adequate and in the best  
19 interests of the Class and all Parties. Defendant does not oppose the Motion. This Notice of  
20 Motion and Motion is also based on the fact that this Settlement was the product of informed,  
21 non-collusive negotiations by the Parties, who were represented by experienced and able  
22 counsel. *See Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex  
23 Litigation (Second) (1985) § 30.44. The proposed settlement meets the legal standard for  
24 preliminary approval and is in the best interests of the Class; the proposed form of Class Notice  
25 explains the Settlement terms in a clear and straightforward manner; the proposed procedures for  
26 notice provide the best practical notice to the Class; and Class Members will have an opportunity  
27 to participate in and/or object to the settlement and/or opt-out of the settlement.

28 This Motion is based upon this Notice of Motion, the accompanying Memorandum of

1 Points and Authorities, the Declarations of Enoch J. Kim, Jessica Aguilar, and Sean Hartranft,  
2 the [Proposed] Order, the Parties' Settlement Agreement and Class Notice, the Court's record of  
3 this action, all matters of which the Court may take notice, and upon such oral or documentary  
4 evidence as the Court may receive at or before the hearing on this unopposed Motion.

5 Dated: April 16, 2026

D.LAW, INC.

6  
7 By /s/ Enoch J. Kim  
8 Roman Shkodnik, Esq.  
9 Mason Doidge, Esq.  
10 Enoch J. Kim, Esq.  
11 Bradford Smith, Esq.  
12 Attorneys for Plaintiff and Settlement  
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