

JAMES HAWKINS APLC
James R. Hawkins (#192925)
Gregory Mauro (#222239)
Michael Calvo (#314986)
Lauren Falk (#316893)
Ava Issary (#342252)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200
Fax: (949) 387-6676
Email: James@jameshawkinsaplc.com
Email: Greg@jameshawkinsaplc.com
Email: Michael@jameshawkinsaplc.com
Email: Lauren@jameshawkinsaplc.com
Email: Ava@jameshawkinsaplc.com

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

LANCE TYLER DUNN, DANIEL
CASTRO, JUAN MIGUEL TORRES
VALENZUELA, STEVEN MUIR, and
FREDRICK EARNHART, individually and
on behalf of all others similarly situated,

Plaintiff,

vs.

RAILPROS FIELD SERVICES, INC. and
DOES 1 through 50, inclusive,

Defendant.

Case No. 24CU022030C

Hon. Blaine K. Bowman
Dept. 74

**NOTICE OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: July 17, 2026
Time: 8:30 AM
Dept.: 74

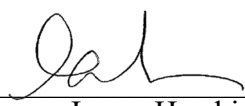
1 **TO THE HONORABLE COURT, ALL PARTIES, AND COUNSEL OF RECORD:**

2 **NOTICE IS HEREBY GIVEN** that on July 17, 2026 at 8:30 am or as soon thereafter as the
3 matter may be heard in Department 74 before the Honorable Blaine K. Bowman of the San
4 Diego County Superior Court, Plaintiffs LANCE TYLER DUNN, DANIEL CASTRO, JUAN
5 MIGUEL TORRES VALENZUELA, STEVEN MUIR, and FREDRICK EARNHART
6 (collectively "Plaintiffs"), by and through Plaintiffs' counsel of record, will and hereby move the
7 Court for Final Approval of the Class Action and PAGA Settlement Agreement and Class
8 Notice, awarding attorneys' fees, litigation costs, Service Awards, Claims Administration
9 Expenses, and entering final approval and judgment.

10 This Motion is made pursuant to Rule 3.769 of the California Rules of Court and Labor
11 Code section 2699(1). This Motion is based on this Notice of Motion and Motion, the attached
12 Memorandum of Points and Authorities, the accompanying Declarations of James R. Hawkins,
13 Nicolas Ferraro, and Tiffany Hyun, the Declaration of Nathalie Hernandez of ILYM Group, Inc.,
14 the Declaration of Lance Tyler Dunn (Exhibit 6 to Hawkins Declaration), the Declaration of
15 Daniel Castro (Exhibit 7 to Hawkins Declaration), the Declaration of Juan Miguel Torres
16 Valenzuela (Exhibit 8 to Hawkins Declaration), the Declaration of Steven Muir (Exhibit 4 to
17 Hawkins Declaration), and the Declaration of Fredrick Earnhart (Exhibit 5 to Hawkins
18 Declaration), the Settlement Agreement and Stipulation to Resolve Class Action and PAGA
19 Claims (the "Settlement Agreement")(Exhibit 2 to Hawkins Declaration), all papers and
20 pleadings filed in the action, and upon any further information or evidence requested by the
21 Court at the time of hearing on this Motion.

22 Dated: June 24, 2026

James Hawkins APLC

23 By: 

24 James Hawkins
Greg Mauro
Michael Calvo
Lauren Falk
Ava Issary

25 Attorney for Plaintiffs Steven Muir and
26 Fredrick Earnhart
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

On June 24, 2026, I served on the interested parties in this action the following document(s) entitled:

NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

[XX] BY ELECTRONIC SERVICE: Based on a court Order or an agreement by the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from the email address Eddie@jameshawkinsaplc.com to the persons at the e-mail addresses listed in the Service List below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

(See Service List Attached)

Executed on June 24, 2026, at Irvine, California


Eddie Magana

1 David A. Garcia, CA Bar No. 218356
david.garcia@ogletree.com
2 Jamie L. Hagerott, CA Bar No. 327277
jamie.hagerott@ogletree.com
3 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
Park Tower, Fifteenth Floor
4 695 Town Center Drive
Costa Mesa, CA 92626
5 Telephone: 714-800-7900
Facsimile: 714-754-1298
6 dianna.kinnamon@ogletreedeakins.com
pamela.blanton@ogletreedeakins.com
7 Attorneys for
8 RAILPROS FIELD SERVICES, INC and
RAILPROS, INC.

9
10 Nicholas J. Ferraro (State Bar No. 306528)
Lauren N. Vega (State Bar No. 306525)
11 Dorota James (State Bar No. 309933)
Ferraro Vega Employment Lawyers, Inc.
12 3333 Camino del Rio South, Suite 300
San Diego, California 92108
13 (619) 693-7727 main / (619) 350-6855 fax
14 nick@ferrarovega.com / lauren@ferrarovega.com /
dorota@ferrarovega.com
15 *Attorneys for Plaintiffs Lance Tyler Dunn and
Daniel Castro*

16
17 Seung Yang (SBN 249857)
seung.yang@thesentinel firm.com
18 Tiffany Hyun (SBN 311743)
tiffany.hyun@thesentinel firm.com
19 Jeffrey Jackson (SBN 290364)
jeffrey.jackson@thesentinel firm.com
20 THE SENTINEL FIRM, APC
21 707 Wilshire Blvd, Suite 4700
Los Angeles, CA 90017
22 Telephone: (213) 985-1150
23 Facsimile: (213) 985-2155
Attorneys for Plaintiffs and the Proposed Class

24 **Via LWDA Website Only**

25 Labor and Workforce Development Agency
26 Attn: PAGA Administrator
1515 Clay Street, Ste 801
27 Oakland, CA 94612
28 <http://www.dir.ca.gov/Private-Attorneys-General-Act>