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Attorneys for Plaintiffs Eric Martin and Armando Correa

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

ARMANDO CORREA, an individual, on behalf of himself and on behalf of all persons similarly situated, and ERIC MARTIN, an individual on behalf of the Aggrieved Employees, and as a representative of the State of California,

Plaintiffs,

v.

THE IMAGINE GROUP, LLC, a Limited Liability Company; and DOES 1 through 50 inclusive,

Defendants.

Case No.: 24STCV27564
Related to: 24NNCV06388

CLASS AND REPRESENTATIVE ACTION

PLAINTIFFS'AMENDED NOTICE OF MOTION AND UNOPPOSED AMENDED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT

Date: November 20, 2026
Time: 9:00 a.m.
Judge: Hon. Laura A. Seigle
Dept: 17

[Filed concurrently with the Amended Memorandum of Points and Authorities; the Amended Declaration of Hali M. Anderson and Declaration of Armando Correa; and [Proposed] Order]

Complaint Filed: October 21, 2024
FAC Filed: June 11, 2026
SAC Filed: November 3, 2026
Trial Date: None set

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TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

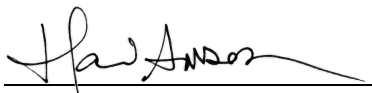
PLEASE TAKE NOTICE that on November 20, 2026, at 9:00 a.m. or as soon thereafter as the Court may be available and be heard in Department 17 of the above-entitled Court, located at 312 North Spring Street, Los Angeles, CA 90012, Plaintiff Eric Martin and Plaintiff Armando Correa on behalf of themselves and the putative class will, and hereby does, move the Court for an order: (1) Preliminarily approving the proposed Class Action and PAGA Settlement; (2) Provisionally certifying the Settlement Class for settlement purposes only under Code of Civil Procedure section 382 and California Rules of Court rule 3.769; (3) Appointing Armando Correa as Class Representative; (4) Appointing ARCH Legal, P.C. as Class Counsel; (5) Approving the form and content of the Class Notice; (6) Appointing APEX Class Action, LLC as the Settlement Administrator and directing the Administrator to implement the notice plan; (7) Scheduling a Final Approval Hearing for March 19, 2027, or as soon thereafter as practicable by the Court; and (8) granting such other relief as the Court deems just and proper.

This Motion is supported by the following documents: (1) this Notice; (2) Plaintiffs' Memorandum of Points and Authorities in Support of Plaintiffs' Unopposed Amended Motion for Preliminary Approval of Class and PAGA Action Settlement; (3) Amended Declaration of Hali M. Anderson in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class and PAGA Action Settlement, and the Exhibits attached thereto; (4) Declaration of Armando Correa in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class and PAGA Action Settlement; and (6) all records and pleadings filed in this action and such argument and evidence which may be presented at or before the hearing.

Respectfully submitted,

Dated: November 6, 2026

ARCH LEGAL, P.C.

By: 

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