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Attorneys for Plaintiff ARIN ESRAELIAN, as an individual, and on behalf of all employees similarly situated,

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

ARIN ESRAELIAN, as an individual, and on
behalf of all similarly situated employees,

Plaintiff,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY, and DOES 1-50, inclusive,

Defendants.

Luis Franco, individually, on behalf of himself
and all other similarly situated employees,

Plaintiff,

vs.

The Goodyear Tire and Rubber Company, an
Ohio corporation, and Does 1-5

Defendants.

Case No.: 21STCV44620
Consolidated with:
Franco Case No.: 22CV393403 and
Rodas Case No.: 21STCV28702

CLASS ACTION

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

Date: February 1, 2023
Time: 1:30 p.m.
Dept.: 3

1 DANIEL RODAS, as an individual and on
2 behalf of all others similarly situated,

3 Plaintiffs,

4
5 vs.

6 THE GOODYEAR TIRE & RUBBER
7 COMPANY, an Ohio corporation; and DOES
8 1 through 50, inclusive,

9 Defendants.
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14 **ADDITIONAL PLAINTIFFS' COUNSEL**

15 Larry W. Lee (State Bar No. 228175)
16 Max W. Gavron (State Bar No. 291697)
17 DIVERSITY LAW GROUP, P.C.
18 515 S. Figueroa Street, Suite 1250
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21 Attorneys for Plaintiff Daniel Rodas

22 Alexei Kuchinsky State Bar No. 279405
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28 Attorney for Plaintiff Luis Franco and the Proposed Class

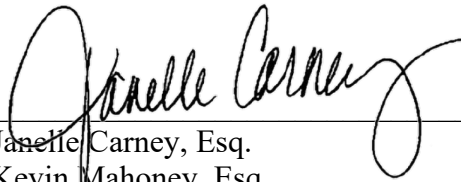
1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on February 1, 2023, at 1:30 p.m., or as soon thereafter as
3 the matter may be heard by the Honorable Patricia M. Lucas in Department 3 of the Santa Clara
4 Superior Court, located at 191 N. First Street, San Jose, California 95113, Plaintiffs will move
5 for an order granting conditional certification and preliminary approval of the class action and
6 PAGA settlement. Good cause exists for the granting of the Motion in that the proposed
7 settlement is fair, reasonable and adequate.

8 The Motion will be based on this Notice of Motion, the Declarations of Janelle Carney,
9 Alexei Kuchinsky, Max W. Gavron, Larry W. Lee, John A. Young, Arin Esraelian, Daniel
10 Rodas, and Luis Franco; the Memorandum of Points and Authorities, and on such oral and
11 documentary evidence as may be presented at the hearing on the Motion.

12 Dated: December 9, 2022

JANELLE CARNEY – ATTORNEY AT LAW, APC
MAHONEY LAW GROUP, APC

14 

16 Janelle Carney, Esq.

Kevin Mahoney, Esq.

17 John A. Young, Esq.

18 Attorneys for Plaintiff ARIN ESRAELIAN and on behalf
19 of all employees similarly situated
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