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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

ADRIAN CASTRO and RODOLFO
GARCIA, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

CONVERGEONE, INC., a Minnesota
corporation; AAA NETWORK
SOLUTIONS, INC, a California corporation;
and DOES 1-50, Inclusive,

Defendants.

Case No. CIVSB2305464

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

Date: May 12, 2025

Time: 8:30 a.m.

Judge: Hon. Charlie L. Hill, Jr.

Dept.: S-30

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on May 12, 2025, or as soon
3 thereafter as the matter can be heard, in Department 1 of the above-entitled Court, before the
4 Honorable Judge Charlie L. Hill, Jr., Plaintiffs Adrian Castro and Rodolfo Garcia ("Plaintiffs")
5 will apply for an order will apply for an order granting (1) Final Approval of the Class Action and
6 PAGA Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated October
8 3, 2024, and California Rules of Court, rule 3.769. This Motion will be based on this Notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Claims
10 and Release of Claims (hereinafter collectively the "Agreement"), the Declaration of Sydney
11 Castillo-Johnson, Esq., the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude
12 Lapuyade, Esq., the Declaration of Michael Gould, Esq., the Declaration of the Settlement
13 Administrator, the Declaration of the Plaintiffs, and the complete files and records in this action.

14 The Court will make a tentative ruling on the merits of this matter by 3:00 p.m. on the
15 court day prior to the hearing. Tentative rulings will be available on the Internet or by calling 1-
16 760-904-5722. To view go to: <http://www.riverside.courts.ca.gov> and click on the tentative ruling
17 link. The tentative ruling shall become the ruling of the Court unless, by 4:30 p.m. on the court
18 day before the scheduled hearing, a party gives notice of intent to appear to all parties and the
19 court. The notice of intent to appear must be given either in person or by telephone. Where notice
20 of intent to appear has been properly given, or upon direction of the Court, oral argument will be
21 permitted.

22 Because all parties have agreed to the proposed class settlement and have met and
23 conferred regarding the motion, this motion is not opposed by Defendant. To date, there have
24 been no objections submitted by the Class.

25
26 Dated: April 17, 2025

Respectfully submitted,
JCL LAW FIRM, APC

27 By Sydney Castillo-Johnson
Sydney Castillo-Johnson, Esq.
28 Attorneys for Plaintiffs