JCL LAW FIRM, APC
Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
Perssia Razma (State Bar #351398)
Carolina Faccin (State Bar #340855)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
prazma@jcl-lawfirm.com
cfaccin@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC
Shani O. Zakay (State Bar #277924)
Jaclyn Joyce (State Bar #285124)
3110 Camino Del Rio S, Suite 308
San Diego, CA 92108
Telephone: (619) 255-9047
shani@zakaylaw.com
jaclyn@zakaylaw.com

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ELISEO FUENTES, an individual, on behalf of himself, and on behalf of all persons similarly situated, Plaintiff, v. KLINE AUTOMOTIVE, INC., a Minnesota corporation; RK Automotive, INC., a Minnesota corporation; and DOES 1-50, Inclusive, Defendants.	Case No.: 24STCV15011 **NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Date: December 10, 2026 Time: 11:00a.m. Dept: 11

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 11:00 a.m. on December 10, 2026, or as soon thereafter as the matter can be heard, in Department 11 of the above-entitled Court, Plaintiff Eliseo Fuentes ("Plaintiff") will apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final Approval Order and Judgment.

This Motion is brought in accordance with the Preliminary Approval Order dated May 13, 2026, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, the First Amended Class Action and PAGA Settlement Agreement and Class Notice (hereinafter the "Agreement"), the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Shani O. Zakay, Esq., the Declaration of the Administrator, the Declaration of Eliseo Fuentes, and the complete files and records in this action.

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

Dated: November 10, 2026

JCL LAW FIRM, APC

By: Perssia Razma
Perssia Razma, Esq.

Attorney for PLAINTIFF