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Attorneys for Plaintiffs EVELYN THREETS, GARY WHITE, and STEVE VILLALOBOS
on behalf of themselves and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

EVELYN THREETS, GARY WHITE,
and STEVE VILLALOBOS, on behalf of
themselves and all others similarly
situated, and the general public,

Plaintiff,

v.

URBAN ALCHEMY, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 24STCV08943

*[Assigned for all purposes to the Hon. Stuart M.
Rice, Dept. 1]*

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

*[Filed concurrently with Memorandum of Points
and Authorities; Declaration of David Arakelyan;
Declaration of Sean Hartranft; Declaration of
Jarret Gorlick; Declarations of Evelyn Threets,
Gary White and Steve Villalobos; and [Proposed]
Order]*

Date: December 18, 2025

Time: 9:00AM

Dept.: 1

Complaint Filed: April 9, 2024

FAC Filed: June 13, 2024

Trial Date: None Set

1 **TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on _____, 2025, at ____ a.m. in Department 1 of the Spring
3 Street Courthouse of the Los Angeles County Superior Court located at 312 N. Spring Street, Los
4 Angeles, CA 90012, Plaintiffs EVELYN THREETS, GARY WHITE, and STEVE
5 VILLALOBOS (“Plaintiffs”), on behalf of themselves and other similarly situated employees of
6 Defendant URBAN ALCHEMY (Defendant and Plaintiffs together referred to as the “Parties”),
7 will and hereby do move this Court pursuant to California Code of Civil Procedure § 382 and
8 California Rule of Court 3.769 for an order as proposed:

- 9 (1) Preliminarily approving the class action settlement reached between Plaintiffs and
10 Defendants, including granting preliminary approval of the following class: all persons
11 employed by Defendant, collectively, or separately, and/or any staffing agencies
12 and/or any other third parties in hourly or non-exempt positions in California during
13 the Class Period,” which is from July 2, 2022, through July 31, 2025
14 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
15 the class; and
16 (3) Setting the final approval hearing.

17 Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed
18 settlement’s allocation of funds to claims made under the Labor Code Private Attorneys General
19 Act of 2004 (“PAGA”).

20 This Notice of Motion and Motion is based on the fact that this is a fair and reasonable
21 settlement that benefits the class and was the product of informed, non-collusive negotiations by
22 the parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.*
23 (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985)§ 30.44. The
24 proposed settlement meets the legal standard for preliminary approval and is in the best interests
25 of the class; the proposed form of notice explains the settlement terms in a clear and
26 straightforward manner; the proposed procedures for notice provide the best practical notice to
27 the class; and that Class Members will have an opportunity to participate in and/or object to the
28 settlement and/or opt-out of the settlement. Defendants do not oppose the Motion.

1 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto
2 (including the Notice to Class Members), the accompanying Memorandum of Points and
3 Authorities, the Declaration of David Arakelyan, the Declaration of Sean Hartranft, the
4 Declaration of Jarrett Gorlick, the Declarations of Evelyn Threets, Gary White, and Steve
5 Villalobos, the pleadings, records and files in the case, and such other further oral and
6 documentary evidence which may be submitted at or before the hearing on this Motion.
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8 Dated: December 5, 2025

Respectfully submitted,

9 D.LAW, INC.

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11 By: 

12 David Keledjian
13 David Arakelyan
14 Attorneys for Plaintiffs on behalf of
15 themselves and others similarly
16 situated
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