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Attorney for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ALEXANDER PEGUES, JR. and MANOLO PEREZ, individuals, on behalf of themselves and on behalf of all persons similarly situated,

Plaintiffs,

v.

ELINK RECRUITING SOLUTIONS, INC., a Georgia Corporation; GLOBAL MAIL, INC., an Ohio Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No.: 22STCV18259

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

Date: February 10, 2026

Time: 10:00 a.m.

Judge: Hon. Carolyn B. Kuhl

Dept.: 12

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on February 10, 2026, or as soon
3 thereafter as the matter can be heard, in Department 12 of the above-entitled Court, before the
4 Honorable Judge Carolyn B. Kuhl, Plaintiffs ALEXANDER PEGUES, JR. and MANOLO PEREZ
5 (“Plaintiffs”) will apply for an order will apply for an order granting (1) Final Approval of the Class
6 Action and 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 September
8 18, 2025, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Class Action and PAGA Settlement Agreement
10 (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-
11 Claude Lapuyade, Esq., the Declaration of the Settlement Administrator, the Declaration of
12 Alexander Pegues, Jr., the Declaration of Manolo Perez, and the complete files and records in this
13 action.

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

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18 Dated: January 14, 2026

ZAKAY LAW GROUP, APLC

19 By: Nicole Noursamadi
20 Nicole Noursamadi, Esq.
21 Attorneys for PLAINTIFF
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