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16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **FOR THE COUNTY OF VENTURA**

18 ALFONSO CEJA RUIZ individually and
19 on behalf of others similarly situated; and
20 the CALIFORNIA LABOR AND
21 WORKFORCE DEVELOPMENT
22 AGENCY, a California governmental
23 agency, *ex rel.* ALFONSO CEJA RUIZ,

24 Plaintiffs,

25 vs.

26 AUTOMOTIVE RACING PRODUCTS,
27 INC., a California corporation; RICHARD
28 JACKSON, an individual; and DOES 1-
15, inclusive,

Defendants.

Case No. 2023CUOE011192

Judge: Hon. Charmaine H. Buehner

Department: 21

CLASS ACTION

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

*[filed concurrently with Plaintiff's Notice of
Motion and Motion; Declaration of Roman
Shkodnik; Declaration of Hallie Von Rock;
Declaration of Bryn Bridley of Atticus
Administration; [Proposed] Order and
[Proposed] Judgment]*

Date: August 13, 2025

Time: 8:30 AM

Dept.: 21

1 D.LAW, INC.
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8 Attorneys for Plaintiff REYNALDO LABO

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

2 PLEASE TAKE NOTICE that on August 13, 2025 at 8:30 a.m., or as soon thereafter as
3 this matter may be heard, at Department 21, located at Hall of Justice, 800 South Victoria
4 Avenue, Ventura, California 93009, Plaintiffs ALFONSO CEJA RUIZ and REYNALDO LABO
5 (collectively “Plaintiffs”), on behalf of themselves and all persons similarly situated, will and
6 hereby moves this Court pursuant to California Code of Civil Procedure § 382 and California
7 Rule of Court 3.769 for an order for final approval of the Amended Class Action and PAGA
8 Settlement Agreement (the “Settlement Agreement” or the “Settlement,”) attached as Exhibit 1 to
9 the Declaration of Hallie Von Rock in Support of Motion for Final Approval of Class Action
10 Settlement, and entry of judgment in accordance with the Settlement.

11 Plaintiffs make this motion on the grounds that good cause exists and the Settlement,
12 which was reached after arm’s length negotiations by counsel for the Class and counsel for
13 Defendant Automotive Racing Products, Inc., is fair and reasonable, has drawn an
14 overwhelmingly favorable response from the Class (indeed, not a single objection to the
15 Settlement was made), and should be given approval by the Court for all the reasons set forth in
16 the memorandum in support of the motion.

17 The Motion is based on this notice, the Memorandum of Points and Authorities, the
18 Declarations of Counsel, Class Representatives, and Atticus Administration, and all other records,
19 pleadings, and papers on file in the Action and such other evidence or argument as may be
20 presented to the Court at the hearing on this Motion. Plaintiffs also submit a Proposed Order
21 Granting Final Approval of Class Action Settlement with their moving papers.

22
23 Dated: July 22, 2025

AIMAN-SMITH & MARCY

24 By: /s/ Hallie Von Rock

25
26 _____
Hallie Von Rock
Attorneys for Plaintiff, Alfonso Ceja Ruiz, on
27 behalf of himself and others similarly situated
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Dated: July 22, 2025

D.LAW, INC

By: /s/ Roman Shkodnik

David Yeremian
Roman Shkodnik
Emma Geesaman
Attorneys for Plaintiff, Reynaldo Labo, on behalf
of himself and others similarly situated