

1 **MAYALL HURLEY, P.C.**  
2 **ROBERT J. WASSERMANN (SBN: 258538)**  
3 [rwassermann@mavallaw.com](mailto:rwassermann@mavallaw.com)  
4 **JENNY D. BAYSINGER (SBN: 251014)**  
5 [jbaysinger@mavallaw.com](mailto:jbaysinger@mavallaw.com)  
6 **112 S Church Street**  
7 **Lodi, California 95240**  
8 **Telephone (209) 477-3833**  
9 **Facsimile: (209)473-4818**

10 **Attorneys for Plaintiffs LEILANI KRYZHANOVSKIY and PATRICIA SALAZAR,**  
11 **individually, on behalf of all others similarly situated, and as a proxy for the LWDA**

12 **UNITED STATES DISTRICT COURT**  
13 **EASTERN DISTRICT OF CALIFORNIA**

14 **LEILANI KRYZHANOVSKIY, PATRICIA**  
15 **SALAZAR ,individually, on behalf of all others**  
16 **similarly situated, and as a proxy for the LWDA;**

17 **Plaintiff,**

18 **v.**

19 **AMAZON.COM SERICES, INC., a Delaware**  
20 **corporation; AMAZON.COM SERVICES, LLC,**  
21 **a Delaware limited liability company; and DOES**  
22 **1-100, inclusive,**

23 **Defendants.**

24 **Case No.: 2:21-cv-01292-BAM**

25 **NOTICE OF PLAINTIFFS' UNOPPOSED**  
26 **MOTION FOR PRELIMINARY**  
27 **APPROVAL OF CLASS ACTION**  
28 **SETTLEMENT**

Date: January 26, 2024  
Time: 9:00 a.m.  
Location: Courtroom 8, 6th Floor  
Judge: Hon. Barbara A. McAuliffe

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

PLEASE TAKE NOTICE that, on January 26, 2024 at 9:00 a.m., or as soon thereafter as counsel may be heard, Plaintiffs Leilani Kryzhanovskiy and Patricia Salazar (collectively, "Plaintiffs") will bring on for hearing before the Honorable United States Magistrate Judge Barbara A. McAuliffe, in Courtroom 8, 6th Floor, Robert E. Coyle United States Courthouse, 2500 Tulare Street, Fresno, CA 93721, this unopposed Motion for Preliminary Approval of Class Action Settlement (the "Motion"). The Motion respectfully requests the Court grant:

1. Preliminary certification of the Class described in the proposed Class Action Settlement Agreement and Release ("Settlement"), defined as follows:

1 a. All current and former non-exempt employees of Defendants in California  
2 between July 22, 2017 and November 7, 2023 who received a Signing and/or  
3 On Sign Bonus in the same workweek as he/she worked overtime, including  
4 doubletime (the “Class”);

- 5 2. Preliminary approval of Plaintiffs Leilani Kryzhanvoskiy and Patricia Salazar as Class  
6 Representative;
- 7 3. Preliminary approval of Mayall Hurley P.C., by and through Lead Counsel Robert J.  
8 Wasserman and Jenny D. Baysinger, and the Law Offices of Mark S. Adams, by and  
9 through Mark S. Adams, as Class Counsel;
- 10 4. Preliminary approval of the Settlement, finding it to be fair, reasonable, adequate, and  
11 in the collective best interest of the Class;
- 12 5. Approval as to the form and content of the proposed Class Notice, a copy of which is  
13 attached as Exhibit A to the Settlement Agreement;
- 14 6. Approval as to the method of notice described in the Settlement;
- 15 7. Authorization for dissemination of the Class Notice pursuant to the terms of the  
16 Settlement;
- 17 8. An order appointing and approving Atticus Class Action Administration as Claims  
18 Administrator, and for preliminary approval of the costs of administration of the  
19 Qualified Settlement Fund for an amount, as declared, not to exceed \$25,000;
- 20 9. Preliminary approval of the proposed PAGA Payment and payment to the LWDA;
- 21 10. Preliminary approval of Class Representative Enhancement Payments in the amount of  
22 \$10,000 to Plaintiff Kryzhanovskiy and \$7,500 to Plaintiff Patricia Salzar in  
23 consideration for their respective contributions as Class Representatives;
- 24 11. Preliminary approval of attorneys’ fees in an amount not to exceed one-third of the  
25 Gross Settlement Fund, presently \$1,000,000, to be distributed 90% to Mayall Hurley,  
26 P.C. and 10% to the Law Offices of Mark S. Adams, and declared costs of up to  
27 \$30,000;

