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

16 JONATHAN GIANNOULIS, et al.

17 Plaintiff

19 v.

21 DIRECTV, LLC,

22 Defendant

Case No. BC596668

CLASS ACTION

[Assigned for all purposes to The Honorable
Maren E. Nelson, Spring Street Dept. 17]

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

Date: April 25, 2022
Time: 9:00 a.m.
Dept: Spring Street Dept. 17
Judge: Hon. Maren Nelson

Action Filed: October 1, 2015
Trial Date: N/A

1 **TO ALL PARTIES AND TO THE COUNSEL OF RECORD FOR EACH PARTY:**

2 **PLEASE TAKE NOTICE** that on April 25, 2022, at 9:00 a.m. or as soon thereafter as
3 the matter may be heard in Spring Street Department 17 of this Court, located at 312 North Spring
4 Street, Los Angeles, California, the Court will take up the motion of plaintiffs Jonathan
5 Giannoulis and Deshon Allen who have moved, on behalf of themselves and all others similarly
6 situated, for:

- 7 1. Preliminary approval of the proposed class settlement of this lawsuit;
- 8 2. Provisional certification of a class defined as follows:

9 All current, former, or prospective workers who were
10 assigned a Technician ID number in the Siebel system, and
11 who installed, serviced, and/or repaired DIRECTV systems
12 in the State of California but were not classified by
13 DIRECTV or any Home Service Provider as W-2
14 employees during the Covered Period—excluding
15 individuals who (1) performed work through White
Communications, LLC, but only during the time they were
performing such work; or (2) had claims against DIRECTV
pending in the United States District Court for the Central
District of California as of August 13, 2020. The “Covered
Period” is the time between October 1, 2011, to the date the
Court preliminarily approves this Settlement.

- 16 3. The appointment of plaintiffs as class representatives and of their counsel as class
17 counsel;
- 18 4. Approval of notice to the class; and
- 19 5. The scheduling of a hearing to consider whether the class settlement should be
20 finally approved.

21 This motion is based on this notice, the accompanying supplemental memorandum in support,
22 and the declarations of George A. Hanson, J. Toji Calabro, Todd C. Werts, Brad Lear, Jonathan
23 Giannoulis, Deshon Allen, and Jonathan Paul filed concurrently herewith, the previous notice of
24 motion dated October 1, 2021, and filed with the Court on that date, the October 1, 2021,
25 memorandum of law filed in support of the motion as of that date, the declarations of George A.
26 Hanson, J. Toji Calabro, and Todd C. Werts, filed on October 1, 2021, the others files and records
27 in this action, and any further evidence and argument that the Court may receive at or before the
28 hearing.

