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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 NICKOLAS TSUI and WILLIAM LUGO,
20 individually and on behalf of all others
21 similarly situated,

22 Plaintiffs,

23 v.

24 UNIVERSAL SERVICES OF AMERICA,
25 LP, ALLIED UNIVERSAL TOPCO LLC,
26 ALLIED UNIVERSAL BENEFITS
27 COMMITTEE, and JOHN AND JANE
28 DOES 1-50,

Defendants.

Case No. 8:22-cv-01158-JWH-JDE
**PLAINTIFFS' NOTICE OF
MOTION AND UNOPPOSED
MOTION FOR FINAL APPROVAL
OF CLASS ACTION
SETTLEMENT AGREEMENT**

Hearing: September 23, 2026
Time: 10:00 a.m.
Judge: Hon. John W. Holcomb
Ctm: 9D

[Concurrently filed Declaration of
Jeffrey Mitchell]

TO THE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that on September 23, 2026, at 10:00 a.m. in Courtroom 9D of the Ronald Reagan Federal Building and U.S. Courthouse, located at 411 W. 4th Street, Santa Ana, California 92701, Plaintiffs Nickolas Tsui and William Lugo (“Plaintiffs”) will and hereby do move for an Order:

1. Granting final approval of the Settlement Agreement between Plaintiffs and Defendants, a copy of which was attached as Exhibit 1 to the granted Plaintiffs’ Motion for Preliminary Approval;
2. Granting final certification to the Settlement Class for settlement purposes only;
3. Granting final approval of the form and manner of the Settlement Notice to the Settlement Class, and finding that notice has been conducted in accordance with the Court-approved notice plan and due process;
4. Dismissing with prejudice Plaintiffs’ and Class Members’ claims against Defendants; and
5. Adopting and entering the proposed Final Approval Order and Final Judgment submitted herewith.

This Motion and the Settlement satisfy the requirements of Federal Rule of Civil Procedure 23 on the grounds the Settlement is fair, reasonable, and adequate, and that the Settlement Notice and notice plan provided the best notice practicable under the circumstances.

This Motion is based on this Notice of Motion and Motion; the supporting Memorandum of Points and Authorities; the Declaration of Jeffrey Mitchell; the [Proposed] Final Approval Order; the [Proposed] Judgment; the pleadings on file herein; and such other and further material to be offered at the Final Approval Hearing.

This Motion is made following the conference of counsel pursuant to L.R. 7-3, which took place on March 6, 2026.

1 Dated: March 27, 2026

Respectfully submitted,

2 */s/ Andrew W. Ferich*
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