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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

JUN 09 2026

DAVID H. YAMASAKI, Clerk of the Court

BY M. NEVAREZ, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

DANIEL CHAFFIN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SOCAL SUPERBIKES, a California
corporation; ALEXANDER JASON
QUINTERO, an individual, JORGE LUIS
GONZALEZ, an individual, JAZMINE
GONZALEZ QUINTERO, an individual,
ERIK MORA, an individual, and DOES 1
through 25, inclusive,

Defendants.

CASE NO. 30-2025-01532976-CU-FR-CXC

**[PROPOSED] ORDER APPROVING
LIMITED NOTICE TO CONSUMERS
AND PUTATIVE CLASS MEMBERS**

*(Parris v. Superior Court (2003) 109
Cal.App.4th 285, 297)*

Date: June 1, 2026
Time: 1:30 p.m.
Dept.: CX103

Assigned for All Purposes to:
The Honorable David A. Hoffer

1 Plaintiff's Motion for Court Approval of Limited Notice to Consumers and Putative Class
2 Members came on regularly for hearing on June 1, 2026, at 1:30 p.m. in Department CX103 of the
3 above-entitled Court, the Honorable David A. Hoffer presiding. Plaintiff appeared by and through
4 counsel Kevin D. Chaffin, Esq. Defendants failed to appear, having previously defaulted in this action.

5 Having considered the Motion, the Declaration of Kevin D. Chaffin filed in support thereof,
6 the exhibits attached thereto, and all papers on file herein, and good cause appearing,

7 **IT IS HEREBY ORDERED:**

8 1. MOTION GRANTED. Plaintiff's Motion for Court Approval of Limited Notice to Consumers and
9 Putative Class Members is GRANTED.

10 2. APPROVED NOTICE. The Court approves the "Notice to Consumers Regarding Pending
11 Litigation and Consumer Rights" attached herewith as Exhibit A ("Notice").

12 3. FINDINGS. The Court finds that the Notice: a. Serves legitimate case management and consumer
13 protection purposes; b. Contains neutral, factual information about the pending litigation and potential
14 consumer rights under California law; c. Includes appropriate disclaimers and does not constitute
15 improper solicitation; d. References only publicly available regulatory findings and established legal
16 principles; e. Is necessary to preserve evidence and protect absent class members' interests before the
17 July 28, 2026 class certification deadline.

18 4. AUTHORIZED DISSEMINATION. Plaintiff is authorized to disseminate the approved Notice to
19 putative class members identified through business records obtained via third-party subpoenas,
20 including but not limited to: a. Direct mail to identified postal addresses; b. Email transmission to
21 identified email addresses; c. Text message to identified cell phone numbers; d. Such other reasonable
22 methods as counsel deems appropriate to reach affected consumers.

23 5. CONSTITUTIONAL COMPLIANCE. This Order approves the Notice as a case management
24 communication that serves legitimate litigation purposes consistent with the constitutional principles
25 established in *Parris v. Superior Court* (2003) 109 Cal.App.4th 285 and *Pioneer Electronics (USA),*
26 *Inc. v. Superior Court* (2007) 40 Cal.4th 360.

1 6. NO IMPROPRIETY FOUND. The Court finds that the approved Notice contains no impropriety
2 and is designed to inform putative class members of: a. The pendency of this litigation; b. Publicly
3 available regulatory citations establishing unlicensed operations; c. General information about
4 potential consumer rights under California law; d. The importance of preserving relevant documents
5 and evidence.

6 7. TIMELINE FOR COMPLETION. The Notice dissemination shall be completed within thirty (30)
7 days of the date of this Order.

8 8. DECLARATION OF COMPLETION. Within forty-five (45) days of the date of this Order,
9 Plaintiff shall file a declaration of completion detailing: a. The number of Notices sent via each
10 delivery method; b. Any delivery failures or returned mail; c. The total estimated number of putative
11 class members reached.

12 9. COSTS. All costs associated with Notice dissemination shall be borne by Plaintiff.

13 10. RETENTION OF JURISDICTION. The Court retains jurisdiction to address any disputes or
14 issues arising from the implementation of this Order.

15 IT IS SO ORDERED.

16
17 DATED: 6/9/26

David A. Hoffer

Hon. David A. Hoffer

Judge of the Superior Court

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EXHIBIT A

1 **NOTICE TO CONSUMERS REGARDING PENDING LITIGATION AND**
2 **CONSUMER RIGHTS**
3 **SOCAL SUPERBIKES UNLICENSED OPERATIONS CLASS ACTION**
4

5 **Re: Daniel Chaffin v. SoCal SuperBikes, et al.**

6 **Orange County Superior Court Case No. 30-2025-01532976-CU-FR-CXC**
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8 **1. IMPORTANT CONSUMER SAFETY AND LEGAL RIGHTS INFORMATION**

9 This notice is being sent to you because records indicate you may have obtained motorcycle
10 inspection, diagnostic, repair, or modification services from SoCal SuperBikes between May 13,
11 2020, and February 18, 2026. This notice provides factual information about pending litigation and
12 potential consumer rights under California law.

13 **2. WHAT IS THIS CASE ABOUT?**

14 A lawsuit has been filed in Orange County Superior Court alleging that SoCal SuperBikes and its
15 operators violated California consumer protection laws by operating an unlicensed motorcycle repair
16 business. The lawsuit seeks to represent California consumers who obtained services from SoCal
17 SuperBikes during the time period when it allegedly operated without required state licensing.

18 **3. CALIFORNIA BUREAU OF AUTOMOTIVE REPAIR FINDINGS**

19 The California Bureau of Automotive Repair (BAR) issued two citations confirming unlicensed
20 operations:

- 21 • Citation issued August 9, 2022: Ordering defendants to "cease all work which requires a
22 valid registration" for operating without required Automotive Repair Dealer Registration in
23 violation of Business and Professions Code section 9884.6(a).
- 24 • Citation with Order of Abatement issued December 10, 2025: Ordering defendants to
25 "immediately cease and desist from violating Business and Professions Code §9884.6(a)" for
26 continued unlicensed operations.
- 27 • These are regulatory findings by the California Bureau of Automotive Repair, not court

determinations of civil liability.

4. IMPORTANT SAFETY INFORMATION

Motorcycles require precision maintenance and repairs for safe operation, especially at highway speeds. Unlicensed motorcycle repair operations may pose safety risks because they are not subject to regulatory oversight, licensing requirements, or mandatory insurance that protect consumers. If you have concerns about work performed on your motorcycle, you may wish to have it inspected by a licensed automotive repair dealer.

5. POTENTIAL CONSUMER RIGHTS UNDER CALIFORNIA LAW

California Business and Professions Code section 9884.6(a) makes it unlawful to operate as an automotive repair dealer without proper licensing. Contracts for services performed by unlicensed operators may be void or unenforceable under California law.

Consumers who paid unlicensed operators may have rights to seek restitution under California's consumer protection laws, including the Consumers Legal Remedies Act (Civil Code § 1781) and Unfair Competition Law (Business and Professions Code § 17200).

6. Additionally, unlicensed operators cannot lawfully:

- Charge storage fees, assert mechanic's liens or sue on a contract for motor vehicle repairs (Cal. Bus. & Prof. Code § 9884.16)
- Provide valid warranties on parts or labor
- Offer consumer protections required of licensed dealers (Cal. Bus. & Prof. Code § 9884.9)

7. These are general statements about California consumer protection law. Individual circumstances vary, and this notice does not guarantee any specific outcome or recovery amount.

8. WHAT THIS NOTICE DOES NOT MEAN

- The court has NOT certified a class action
- The court has NOT determined that any laws were violated
- This lawsuit has NOT been decided
- You are NOT automatically represented by any attorney
- You are NOT required to take any action

- No money or benefits are currently available

9. PRESERVE YOUR RECORDS

Whether or not you choose to participate in this litigation, you may wish to preserve documents related to your dealings with SoCal SuperBikes, including:

- Receipts, invoices, or payment records
- Written estimates or work orders
- Communications (texts, emails, voicemails)
- Before/after photographs of your motorcycle
- Records of subsequent repairs or inspections

These records may be important for understanding your consumer rights under California law.

10. YOUR OPTIONS

You have several options:

- Do nothing at this time
- Contact counsel listed below, that filed this lawsuit for more information
- Consult with your own attorney about your individual situation
- Monitor the case through public court records

If you choose to contact counsel that filed this lawsuit, there is no obligation to participate in the lawsuit.

11. FOR MORE INFORMATION

If you wish to learn more about this case or your potential rights under California consumer protection law, you may contact counsel that filed this lawsuit:

Kevin D. Chaffin, Esq.
Chaffin Law Group PC
2829 Townsgate Road, Suite 100
Westlake Village, CA 91361
Telephone: 805.650.8200
Text: 805.837.3428
Email: contact@chaffinlawgroup.com
Web: www.chaffinlawgroup.com

You may also access public court documents by visiting the Orange County Superior Court website or by contacting the court clerk.

1 **12. IMPORTANT DISCLAIMERS**

- 2 • This notice is for informational purposes only
- 3 • This notice does not constitute legal advice
- 4 • Receipt of this notice does not mean you are represented by any attorney
- 5 • No attorney-client relationship is created by this notice
- 6 • Individual legal questions require consultation with an attorney
- 7 • This notice has been approved by the court for dissemination
- 8

9 **13. DO NOT CONTACT THE COURT ABOUT THIS NOTICE**

10 **14. THIS NOTICE IS AUTHORIZED BY ORDER OF THE SUPERIOR COURT OF**

11 **CALIFORNIA FOR THE COUNTY OF ORANGE**

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PROOF OF SERVICE

DANIEL CHAFFIN v. SOCAL SUPERBIKES et al.
Orange County Superior Court Case No. **30-2025-01532976-CU-FR-CXC**

I am Counsel for Plaintiff(s) in this action, employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action; my business address is Chaffin Law, 2829 Townsgate Road Suite 100, Westlake Village, CA 91361.

On June 1, 2026, I served a copy of the foregoing document alleged as **[PROPOSED] ORDER APPROVING LIMITED NOTICE TO CONSUMERS AND PUTATIVE CLASS MEMBERS** on the interested parties in this action addressed as follows:

SEE ATTACHED SERVICE LIST

- ☐ **BY MAIL** (CCP §1013(a) and (b)): I am readily familiar with the firm's practice of collection and processing correspondence for mailing with the U.S. Postal Service. Under that practice such envelope(s) is deposited with the U.S. Postal Service on the same day this declaration was executed, with postage thereon fully prepaid at 9425 Telephone Rd. #445, Ventura, CA 93004, in the ordinary course of business.
- ☐ **BY PERSONAL SERVICE** (CCP §1011): I caused to be served by hand to the addressee(s) as stated above via
- ☐ **BY OVERNIGHT DELIVERY** (CCP §1013(c) and (d)): I am readily familiar with the firm's practice of collection and processing items for delivery with Overnight Delivery. Under that practice such envelope(s) is deposited at a facility regularly maintained by Overnight Delivery or delivered to an authorized courier or driver authorized by Overnight Delivery to receive such envelope(s), on the same day this declaration was executed, with delivery fees fully provided for at 9601 Wilshire Boulevard, 7th Floor, Beverly Hills, California 90210, in the ordinary course of business.
- ☐ **BY FACSIMILE** CCP §1013(e), (f) and CRC Rule 2008: I served the above stated document by facsimile from the facsimile machine of Chaffin Law Office whose fax number is 805.650.8200
- ☐ **BY ELECTRONIC TRANSMISSION.** Based on Code of Civil Procedure §1010.6(b) or a Court order or an agreement of the parties to accept service by electronic transmission, I caused the document to be sent to the persons at the e-mail addresses listed herein. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on June 1, 2026 at Pico Rivera, California.

- ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Liza Quinonez

Print Name

Signature

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SERVICE LIST

DANIEL CHAFFIN v. SOCAL SUPERBIKES et al.

Orange County Superior Court Case No. **30-2025-01532976-CU-FR-CXC**

SIDHU LAW, APC
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Tel: (805) 222-4761

DEFAULT ENTERED AGAINST DEFENDANTS:
SOCAL SUPERBIKES, a California corporation
ALEXANDER JASON QUINTERO
JORGE LUIS GONZALEZ
JAZMINE GONZALEZ QUINTERO