

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
5440 Morehouse Drive, Suite 3500
San Diego, CA 92121
Telephone: (619)255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com

Attorneys for Plaintiff MANUEL VILLA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF FRESNO

MANUEL VILLA, an individual(s), on behalf
of himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

TRILLIUM PUMPS USA, INC., a Delaware
Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. 22CECG01104

**NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: October 17, 2023

Time: 3:27p.m.

Judge: Hon. Jonathan Skiles

Dept.: 403

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on October 17, 2023, at 3:30 p.m., or as soon thereafter as
3 counsel may be heard, in Department 403 of the Fresno Superior Court, the Honorable Judge Jonathan
4 Skiles presiding, Plaintiff Manuel Villa will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
6 and PAGA Action Claims and Release of Claims ("Agreement") attached as Exhibit A to the
7 Declaration of Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement to
10 the Settlement Class;

11 4. Appoint Plaintiff MANUEL VILLA as the Class Representative;

12 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; and

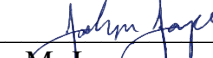
13 7. Set a hearing date for final approval of the settlement.

14 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
15 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
16 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
17 Declaration of Plaintiff Manuel Villa; (6) the Declaration of Settlement Administrator representative
18 Lisa Mullins; (7) the Class Action and PAGA Settlement Agreement and exhibit attached thereto; (8)
19 the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement and
20 exhibits attached thereto; (9) the records, pleadings, and papers filed in this action; and (10) upon such
21 other documentary and oral evidence or argument as may be presented to the Court at or prior to the
22 hearing of this Motion.

23 As this Motion is unopposed, the Parties respectfully request relief from the page limit
24 requirement set by California Rules of Court, Rule 3.1113(d).

25 Dated: September 21, 2023

ZAKAY LAW GROUP. APLC

26 By: 
27 Jaclyn M. Joyce
28 Attorneys for Plaintiff