

JCL LAW FIRM, APC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

DANTE HENDERSON, an individual, on
behalf of himself, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

BIZON GROUP, INC. a California
corporation; and DOES 1 through 50, Inclusive;

Defendants.

Case No. HG21115170

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

Date: December 15, 2023
Time: 9:00 a.m.

Judge: Hon. Evelio Grillo
Dept.: 21
Reservation ID: 780156766364

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

2 PLEASE TAKE NOTICE that on December 15, 2023, at 9:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 21 of the Alameda County Superior Court, the Honorable Evelio
4 Grillo presiding, plaintiff Dante Henderson will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action and PAGA
6 Settlement Agreement (“Agreement”) attached as Exhibit 1 to the Declaration of Jean-Claude
7 Lapuyade, Esq. filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Class Action Settlement to the
10 Settlement Class attached as Exhibit A to the Agreement;

11 4. Appoint Plaintiff Dante Henderson as the Class Representative;

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

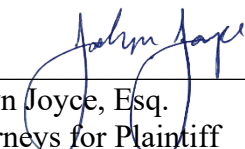
13 6. Set a hearing date for final approval of the settlement.

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 Dante Henderson; (6) the declaration of Sean Hartranft; (7) the Class Action and PAGA
18 Settlement Agreement and exhibit attached thereto; (8) the [Proposed] Order Granting Preliminary
19 Approval of Class Action and PAGA Settlement and exhibits attached thereto; (9) the records,
20 pleadings, and papers filed in this action; and (10) upon such other documentary and oral evidence or
21 argument as may be presented to the Court at or prior to the hearing of this Motion.

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

24
25 Dated: November 20, 2023

ZAKAY LAW GROUP, APLC

26 By: 
27 Jaclyn Joyce, Esq.
28 Attorneys for Plaintiff



Court Reservation Receipt

Reservation

Reservation ID:
780156766364

Status:
RESERVED

Reservation Type:
Motion re: (Motion for Preliminary Approval of Class
Action and PAGA Settlement)

Number of Motions:
1

Case Number:
HG21115170

Case Title:
Henderson VS Bizon Group, Inc.

Filing Party:
Dante Henderson (Plaintiff)

Location:
Rene C. Davidson Courthouse - Department 21

Date/Time:
December 15th 2023, 9:00AM

Confirmation Code:
CR-UG9WLGFO8Z7JYMXK

Fees

Description	Fee	Qty	Amount
Reschedule Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount:
\$1.00

Type:
Visa

Account Number:
XXXX9291

Authorization:
05599G

Payment Date:
2023-11-13

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