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Attorneys for Plaintiff VINCENT LESLIE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

VINCENT LESLIE, an individual, on behalf
of himself and on behalf of all persons
similarly situated,

Plaintiff,

v.

P.F.C. ENTERPRISES, INC. dba ALLEN
PROPERTIES, a California Corporation; and
DOES 1-50, Inclusive,

Defendants.

Case No. CIVSB2207363

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

Date: January 4, 2024

Time: 8:30 a.m.

Judge: Hon. Jessica Morgan

Dept.: S-26

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

2 PLEASE TAKE NOTICE that on January 4, 2024, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department S-26 of the San Bernardino Superior Court, the Honorable Judge Jessica
4 Morgan presiding, plaintiff VINCENT LESLIE 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 1 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 VINCENT LESLIE 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 Vincent Leslie, (6) the Stipulation of Class and PAGA Action Claims and Release of
18 Claims and exhibit attached thereto; (7) the [Proposed] Order Granting Preliminary Approval of Class
19 Action and PAGA Settlement and exhibits attached thereto; (8) the records, pleadings, and papers filed
20 in this action; and (9) upon such other documentary and oral evidence or argument as may be presented
21 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: December 8, 2023

JCL LAW FIRM APC

26 By: 
27 Jean-Claude Lapuyade, Esq.
Attorneys for Plaintiff