

JCL LAW FIRM, APC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

VERONICA A. MARAVILLA, an individual,
on behalf of herself and on behalf of all persons
similarly situated,

Plaintiff,

v.

VENUS ET FLEUR LLC, a New Jersey
Limited Liability Company; and DOES 1-50,
Inclusive,

Defendants.

Case No: 22STCV05864

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

Date: November 27, 2023

Time: 11:00 a.m.

Judge: Hon. Jessica C. Kronstadt

Dept.: 7

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

2 PLEASE TAKE NOTICE that on November 27, 2023, at 11:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 7 of the San Diego Superior Court, the Honorable Judge
4 Lawrence Riff presiding, Plaintiff Veronica A. Maravilla (“Plaintiff”) will, and hereby does, move
5 this Court to:

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

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class and PAGA
11 Representative Action Settlement and Final Hearing Date (“Class Notice”) attached as Exhibit A to
12 the Agreement;

13 4. Appoint Plaintiff Veronica A. Maravilla as the Class Representatives;

14 5. Appoint Jean-Claude Lapuyade, Esq. of the JCL Law Firm, APC, and Shani O. Zakay,
15 Esq. of Zakay Law Group, APLC, as Class Counsel; and

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

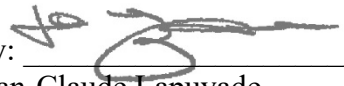
17 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
18 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
19 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
20 Declaration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

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

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4 Dated: October 6, 2023

JCL LAW FIRM, APC

5 By: 
6 Jean-Claude Lapuyade
7 Attorneys for Plaintiff
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