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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF TULARE

AMANDA HERNANDEZ, KIMBERLY
CONLEY, GRAVIELA VALENCIA, and
SERENA VELASQUEZ, individuals, on
behalf of themselves and on behalf of all
persons similarly situated,

Plaintiffs,

v.

PARENTING NETWORK, INC., a California
Corporation, a California Corporation; and
DOES 1-50, Inclusive,

Defendant.

Case No. VCU287027

Action Filed: May 19, 2021

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

Date: August 16, 2022

Time: 8:30 AM

Dept.: 7

Judge: Hon. Brett Hillman

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

2 PLEASE TAKE NOTICE that on August 16, 2022, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 7 of the Tulare County Superior Court, the Honorable Brett Hillman
4 presiding, Plaintiffs AMANDA HERNANDEZ, KIMBERLY CONLEY, GRAVIELA VALENCIA,
5 and SERENA VELASQUEZ (collectively, hereinafter, "Plaintiffs") will, and hereby do, move this
6 Court to:

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

10 2. Conditionally certify the Settlement Class;

11 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement to
12 the Settlement Class;

13 4. Appoint Plaintiffs AMANDA HERNANDEZ, KIMBERLY CONLEY, GRAVIELA
14 VALENCIA, and SERENA VELASQUEZ as the Class Representatives;

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

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

17 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points
18 and Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement;
19 (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5)
20 the Stipulation of Settlement of Class Action and PAGA Claims and Release of Claims and exhibit
21 attached thereto; (6) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA
22 Settlement and exhibits attached thereto; (7) the records, pleadings, and papers filed in this action; and
23 (8) upon such other documentary and oral evidence or argument as may be presented to the Court at
24 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: July 25, 2022

JCL LAW FIRM, APC

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