

JCL LAW FIRM, APC

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

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
Julieann Alvarado (State Bar #334727)
5440 Morehouse Drive, Suite 5400
San Diego, CA 92121
Telephone: (619) 255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com
julieann@zakaylaw.com

Attorneys for Plaintiff VY TRINH

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

VY TRINH, an individual, on behalf of himself
and on behalf of all persons similarly situated,

Plaintiff,

v.

PRECISION METAL PRODUCTS, INC., a
Delaware Corporation; HBD INDUSTRIES,
INC., a Delaware Corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 37-2022-00000965-CU-OE-CTL

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

Date: June 9, 2023

Time: 9:30 a.m.

Judge: Hon. Matthew C. Braner

Department: C-60

Trial Date: N/A

Action Filed: January 10, 2022

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

2 PLEASE TAKE NOTICE that on June 9, 2023, at 9:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department C-60 of the San Diego Superior Court, the Honorable Matthew C. Braner
4 presiding, plaintiff VY TRINH ("Plaintiff") will, and hereby does, move this Court to:

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

8 2. Conditionally certify the Settlement Class;

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

11 4. Appoint Plaintiff VY TRINH 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 and PAGA Action Settlement; (3)
16 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
17 Declaration of Vy Trinh; (7) the Stipulation of Settlement of Class and PAGA Action Claims and
18 Release of Claims and exhibit attached thereto; (8) the [Proposed] Order Granting Preliminary
19 Approval of Class and PAGA Action 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: May 16, 2023

JCL LAW FIRM, APC

26 By: 
27 Jean-Claude Lapuyade
28 Attorneys for Plaintiff