

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
Monnett De La Torre (State Bar #272884)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
mdelatorre@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 3600
San Diego, CA 92121
Telephone: (619)255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com
julieann@zakaylaw.com

Attorneys for Plaintiff LATISHA SHACONNA ANDERSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

LATISHA SHACONNA ANDERSON, an
individual, on behalf of herself, and on behalf
of all persons similarly situated,

Plaintiff,

v.

BARTON MYERS ASSOCIATES, INC., a
California Corporation; BARTON
ASSOCIATES, INC., a California Corporation;
BARTON & ASSOCIATES, INC., which will
do business in California as BARTON
MEDICAL, INC., a Delaware Corporation; and
DOES 1 through 50, Inclusive,

Defendants.

Case No. 21STCV43314

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

Date: December 14, 2022

Time: 9:00 a.m.

Judge: Elihu M. Berle

Dept.: 6

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

2 PLEASE TAKE NOTICE that on December 14, 2022, at 9:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 6 of the Los Angeles County Superior Court, the Honorable
4 Elihu M. Berle presiding, plaintiffs LATISHA SHACONNA ANDERSON, SARAH BAXLEY,
5 JASON ANDERSON, and MELODY JAMES (collectively, "Plaintiffs"), will, and hereby do, move
6 this Court to:

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

13 4. Appoint Plaintiffs LATISHA SHACONNA ANDERSON, SARAH BAXLEY, JASON
14 ANDERSON, and MELODY JAMES, as the Class Representatives;

15 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, Hartounian Law Firm,
16 P.C., and Law Offices of Corbett H. Williams as Class Counsel; and

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

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

26
27 ///

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).**

3
4 Dated: November 15, 2022

JCL LAW FIRM, APC

5 By: 
6 Jean-Claude Lapuyade
7 Attorneys for Plaintiff
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28