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Attorneys for Plaintiff JESSICA HERRIGAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JESSICA HERRIGAN, an individual, on
behalf of herself and on behalf of all persons
similarly situated,

Plaintiffs,

v.

CHILDREN'S SPECIALISTS OF SAN
DIEGO, A MEDICAL GROUP, INC., a
California Corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 37-2021-00014044-CU-OE-CTL

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

Date: July 22, 2022

Time: 9:00 a.m.

Reservation No.: 2840069

Judge: Hon. Joel Wohlfeil

Dept.: 73

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

2 PLEASE TAKE NOTICE that on July 22, 2022, at 9:00 a.m. or as soon thereafter as counsel
3 may be heard, in Department C-73 of the San Diego County Superior Court, the Honorable Judge Joel
4 Wohlfeil presiding, plaintiff JESSICA HERRIGAN 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 A to the
7 Declaration 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 to
10 the Class;

11 4. Appoint Plaintiff JESSICA HERRIGAN as the Class Representative;

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

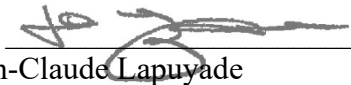
13 7. Set a hearing date for final approval of the settlement.

14 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points
15 and Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement;
16 (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5)
17 the Declaration of Jessica Herrigan; (6) the Stipulation of Settlement of Class and PAGA Action
18 Claims and Release of Claims and exhibit attached thereto; (7) the [Proposed] Order Granting
19 Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto; (8) the
20 records, pleadings, and papers filed in this action; and (9) upon such other documentary and oral
21 evidence or 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: June 15, 2022

JCL LAW FIRM, APC

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