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Attorneys for Plaintiff DINO DESANCTIS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF CONTRA COSTA

DINO DESANCTIS; TYRONE BARNES,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiffs,

v.

DOUGLAS PRODUCTS & PACKAGING
COMPANY, LLC, a Missouri Limited
Liability Company; and DOES 1-50, Inclusive,

Defendant.

Case No. C21-01874

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

Date: May 15, 2023
Time: 9:00 a.m.

Judge: Hon. Judge Charles S. Treat
Dept.: 39

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

2 PLEASE TAKE NOTICE that as soon as counsel may be heard, in Department 39 of the Contra
3 Costa Superior Court, the Honorable Judge Charles S. Treat presiding, plaintiffs DINO DESANCTIS
4 and TYRONE BARNES will, and hereby do, move this Court to:

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

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Class Action Settlement to the
10 Settlement Class;

11 4. Appoint Plaintiffs DINO DESANCTIS and TYRONE BARNES as the Class
12 Representatives;

13 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, Bokhour Law Group, P.C.,
14 and Falakassa Law, P.C. as Class Counsel; and

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

16 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points
17 and Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement;
18 (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5)
19 the Declaration of Joshua Falakassa, Esq.; (6) the Declaration of Dino Desanctis; (7) the Declaration
20 of Tyrone Barnes; (8) the Stipulation of Settlement of Class Action and PAGA Claims and Release of
21 Claims and exhibit attached thereto; (9) the [Proposed] Order Granting Preliminary Approval of Class
22 and PAGA Action Settlement and exhibits attached thereto; (10) the records, pleadings, and papers
23 filed in this action; and (11) upon such other documentary and oral evidence or argument as may be
24 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: April 19, 2023

JCL LAW FIRM, APC

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