

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 3500
San Diego, CA 92121
Telephone: (619)255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com
julieann@zakaylaw.com

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP
Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Nicholas J. De Blouw (State Bar #280922)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Website: www.bamlawca.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

JEAN-LOUIS CHALAYE and SCOTT
BALLIET, individuals, on behalf of themselves
and on behalf of all persons similarly situated,

Plaintiffs,

v.

PRIDE TRANSPORT., a Corporation; and
DOES 1-50, Inclusive,

Defendants.

Case No. STK-CV-UOE-2021-2766

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

Hearing Date: April 20, 2023
Hearing Time: 9:00AM

Judge: Hon. Barbara A. Kronlund
Dept: 10D

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on April 20, 2023, or as soon
3 thereafter as the matter can be heard, in Department 10D of the above-entitled Court, before the
4 Honorable Barbara A. Kronlund, Plaintiffs JEAN-LOUIS CHALAYE and SCOTT BALLE
5 (“Plaintiffs”) will apply for an order will apply for an order granting (1) Final Approval of the Class
6 Action and PAGA Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated December
8 16, 2022, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Class and Collective Action Settlement Agreement
10 (hereinafter collectively the “Agreement”), the Declaration of Shani O. Zakay, Esq., the Declaration
11 of Nicholas J. De Blouw, Esq., the Declaration of Stephen Gomez (the Settlement Administrator),
12 the Declaration of the Plaintiffs, and the complete files and records in this action.

13 Because all parties have agreed to the proposed class settlement and have met and conferred
14 regarding the motion, this motion is not opposed by Defendant. To date, there have been no
15 objections submitted by the Class.

16 Respectfully submitted,

17
18 Dated: March 28, 2023

ZAKAY LAW GROUP, APLC

19 By: 
20 Shani O. Zakay, Esq.
21 Attorneys for Plaintiff
22
23
24
25
26
27
28