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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN BERNARDINO

CHRISTOPHER CHACON, an individual, on
behalf of himself and on behalf of all persons
similarly situated and the State of California,

Plaintiff,

v.

PANDA MOTORS, INC. a California
Corporation; EDGAR CASTELLANOS, an
individual; and DOES 2-50, Inclusive.

Defendants.

Case No. CIVDS2022220

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

Hearing Date: April 20, 2023
Hearing Time: 1:30 p.m.

Department: S17
Judge: Hon. Joseph Ortiz

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

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on April 20, 2023, or as soon
3 thereafter as the matter can be heard, in Department S17 of the above-entitled Court, before the
4 Honorable Joseph Ortiz, Plaintiffs CHRITOPHER CHACON, NICHOLAS CORDERO, VYNZ
5 PUNONGBAYAN, AND LUIS VEGAO (“Plaintiffs”) will apply for an order (1) preliminary
6 approving the proposed settlement of this Class and PAGA action with Defendants’ PANDA
7 MOTORS and EDGAR CASTELLANOS (“Defendants”); (2) approving the form and method for
8 providing class-wide notice; (3) directing that notice of the proposed settlement be given to the
9 class; and (4) scheduling a final approving hearing date to consider Plaintiffs motion for final
10 approval of the settlement and entry of the Judgment, and Plaintiffs motion for approval of
11 attorneys’ fees and litigation expenses.

12 This motion for preliminary approval of the class and PAGA settlement is brought pursuant
13 to California Rules of Court, rule 3.769. Plaintiffs motion will be based on this notice of motion
14 and motion, the accompanying points and authorities, the Declaration of Nicholas De Blouw, Esq.,
15 the Declaration of Shani O. Zakay, Esq., the Declaration of Michael C. Robinson, Esq., the
16 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims (“Agreement”)
17 between the parties, and the complete files and records in this action. All parties have agreed to the
18 proposed class and PAGA settlement and have met and conferred regarding the motion; therefore,
19 this motion is not opposed by Defendant.

20 Respectfully submitted,

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22 Dated: March 20, 2023

ZAKAY LAW GROUP, APLC

23 By: 
24 Shani O. Zakay, Esq.
25 Attorneys for Plaintiff
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