

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Monnett De La Torre (State Bar #272884)
Sydney Castillo Johnson (State Bar #343881)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com
mdelatorre@jcl-lawfirm.com
scastillo@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 5400
San Diego, CA 92121
Telephone: (619) 255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com
julieann@zakaylaw.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

GABRIEL MENDEZ, GEORGE GOSCH,
JOHN DIAN, MICHAEL KNIGHTON,
individuals, on behalf of themselves and on
behalf of all person similarly situated,

Plaintiffs,

vs.

BONDZ, INC., a California Corporation; and
DOES 1-50, Inclusive,

Defendants

Case No. STK-CV-UOE-2020-0007486

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

Hearing Date:

Hearing Time: 9:00 a.m.

Judge: Hon. George J. Abdallah

Dept.: 10A

Action Filed: September 9, 2020

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

2 PLEASE TAKE NOTICE that on _____, 2023, at 9:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 10A of the San Joaquin Superior Court, the Honorable George
4 J. Abdallah presiding, Plaintiffs GABRIEL MENDEZ, GEORGE GOSCH, JOHN DIAN and
5 MICHAEL KNIGHTON (“Plaintiffs”) will, and hereby does, move this Court to:

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

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Class Action and PAGA Settlement to
11 the Settlement Class;

12 4. Appoint Plaintiffs GABRIEL MENDEZ, GEORGE GOSCH, JOHN DIAN and
13 MICHAEL KNIGHTON as the Class Representative;

14 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC 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; (2) the Memorandum of Points and
17 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
18 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
19 Declaration of George Gosch; (6) the Declaration of John Dian; (7) the Declaration of Michael
20 Knighton; (8) the Declaration of Gabriel Mendez; (9) the Stipulation of Settlement of Class and PAGA
21 Action Claims and Release of Claims and exhibit attached thereto; (10) the [Proposed] Order Granting
22 Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto; (11) the
23 records, pleadings, and papers filed in this action; and (12) upon such other documentary and oral
24 evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

25
26
27 ///

28 ///

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: March 21, 2023

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