

JEAN-CLAUDE LAPUYADE (SBN 248676)

JLAPUYADE@JCL-LAWFIRM.COM

JCL LAW FIRM, APC

3990 OLD TOWN AVENUE, SUITE C204

SAN DIEGO, CA 92110

TEL: 619-599-8292

FAX: 619-599-8291

NORMAN B. BLUMENTHAL, ESQ. (SBN 68687)

KYLE R. NORDREHAUG, ESQ. (SBN 205975)

APARAJIT BHOWMIK, ESQ. (SBN 248066)

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW, LLP

2255 CALLE CLARA

LA JOLLA, CA 92037

TEL: 858-551-1223

FAX: 858-551-1232

ATTORNEYS FOR PLAINTIFF

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO

JACQUELINE BALTAZAR an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

WESTGATE HOTEL COMPANY, a
Corporation; SINCLAIR SERVICES
COMPANY, a Corporation; GRAND
AMERICAN HOTELS & RESORTS, INC.;
and DOES 1 through 30, Inclusive;

Defendants.

Case No. 37-2020-00005102

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

Date: August 27, 2021

Time: 1:30 p.m.

Judge: Hon. Timothy Taylor

Dept.: 72

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

PLEASE TAKE NOTICE that on August 27, 2021 at 1:30 p.m., or as soon thereafter as counsel may be heard, in Department 72 of the San Diego Superior Court, 330 West Broadway, San Diego, CA 92101, the Honorable Judge Timothy Taylor presiding, plaintiff JACQUELINE BALTAZAR, (hereinafter "Plaintiff"), will move this Court for an Order Granting Final Approval of Class Action Settlement and Judgment.

1 This **unopposed** Motion seeks final approval of the Joint Stipulation for Settlement and Release
2 of Class Action and PAGA Claims (“Agreement”), including the approval of the (2) Individual
3 Settlement Payments to Settlement Class Members, (3) PAGA Settlement; and (4) the Settlement
4 Administration Costs to the claim administrator, Simpluris, Inc.

5 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
6 Points and Authorities in Support of Motion for Final Approval of Class Action Settlement; (3) the
7 Declaration of Jean-Claude Lapuyade, Esq., in Support of Motion for Final Approval of Class Action
8 Settlement; (4) the Declaration of Stephanie Molina in Support in Motion for Final Approval of Class
9 Action Settlement; (5) the [Proposed] Order Granting Final Approval of Class Action Settlement; (6)
10 the [Proposed] Judgment; (7) the Motion for Class Counsel Award and Class Representative Service
11 Award filed concurrently herewith; (8) the Declarations of Jean-Claude Lapuyade, Esq., in Support of
12 the Motion for Class Counsel Award and Class Representative Service Awards; (9) all the papers and
13 pleadings previously filed in support of Plaintiffs’ Motion for Preliminary Class Action Settlement
14 Approval; and (11) upon such other documentary and/or oral evidence as may be presented to the Court
15 at the hearing.

16 Plaintiff and Class Counsel’s Motion for Class Counsel Award and Class Representative Service
17 Award, together with the Declaration of Class Counsel Jean-Claude Lapuyade, Esq. are filed
18 concurrently herewith.

19 As this Motion is unopposed, the Parties respectfully request relief from the page limit
20 requirement set by California Rules of Court, Rule 3.1113(d).

21
22 Dated: August 4, 2021

JCL LAW FIRM, APC

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