

Armond M. Jackson, SBN 281547
ajackson@jacksonapc.com
Andrea M. Fernandez-Jackson, SBN 295924
afernandez@jacksonapc.com
Anthony S. Filer, Jr., SBN 337704
afiler@jacksonapc.com
JACKSON APC
2 Venture Parkway, Suite 240
Irvine, California 92618
Phone: (949) 281-6857
Fax: (949) 777-6218

Attorneys for Plaintiff Daniel Carillo-Salazar,
individually, and on behalf of all other similarly
situated employees

**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE—CIVIL COMPLEX CENTER**

In re WATERMARK WAGE AND HOUR
CASES

Coordination Proceedings Special Title
(C.R.C. Rule 3.550)

Included Actions:

*Daniel Carillo-Salazar v. Watermark Services
IV, LLC, et al.,*
Orange County Superior Court
Case No. 30-2020-01126766-CU-OE-CXC

*Evanina Alaniz v. Watermark Retirement
Communities LLC, et al.,*
Los Angeles County Superior Court
Case No. 20STCV16386

*Katherine Greene v. Watermark Retirement
Properties, Inc., et al.,*
Monterey County Superior Court
Case No. 20CV002422

Case No.: JCCP 5176

Assigned for all purposes to:
Hon. William Claster
Dept. CX104

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

Date: September 8, 2023

Time: 9:00 am

Place: Department CX104

Action Filed: January 27, 2020

Trial Date: None

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on September 8, 2023 at 9:00 a.m., or as soon
3 thereafter as the matter may be heard at the above titled court, located at 751 West Santa Ana
4 Blvd., Santa Ana, CA 92701, Dept. CX104, the Honorable William Claster presiding, Plaintiffs
5 Daniel Carillo-Salazar and Evanina Alaniz will and hereby does move the Court, pursuant to
6 Code of Civil Procedure § 382 for an Order granting final approval of the Proposed Stipulation
7 of Class Action Settlement (“Settlement Agreement”) entered into between the Plaintiffs, on
8 behalf of itself and all others similarly situated, and Defendant Watermark Services, IV, LLC,
9 Defendant Watermark Retirement Communities, Inc., and Defendant Watermark Retirement
10 Communities, LLC (“Defendants”).

11 This Motion is based upon; (1) this Notice of Motion and Motion; (2) the Memorandum
12 of Points and Authorities in Support of the Motion for Final Approval of Class Action
13 Settlement; (3) the Declaration of Armond M. Jackson; (4) Declaration of Claims Administrator;
14 (5) Settlement Agreement; (6) Declaration of Plaintiff Daniel Carillo-Salazar; (7) the [Proposed]
15 Order Granting Final Approval of Class Action Settlement; (8) the records, pleadings, and papers
16 filed in this action; and (9) upon such other documentary and oral evidence or argument as may
17 be presented to the Court at or prior to the hearing of this Motion.
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20 Dated: August 16, 2023

JACKSON APC

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22 By: /s/ Armond M. Jackson

23 Armond M. Jackson

24 Attorney for Plaintiff Daniel Carillo-Salazar
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