

Armond M. Jackson, SBN 281547
ajackson@jacksonapc.com
Andrea M. Fernandez, SBN 295924
afernandez@jacksonapc.com
Anthony S. Filer Jr., SBN 337704
afiler@jacksonapc.com
JACKSON LAW, APC
2 Venture Parkway, Ste. 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 THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE COUNTY – 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.: No. JCCP 5176

Assigned for all purposes to:
Hon. William Claster
Dept. CX 104

**PLAINTIFFS' NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: January 13, 2023
Time: 9:00 a.m.
Place: Department CX 104

Reservation ID: 73898977

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

3 **PLEASE TAKE NOTICE** that on January 13, 2023 at 9:00 a.m., or as soon thereafter as
4 counsel may be heard, in Department CX 104 of the above-captioned court, located at 751 W Santa
5 Ana Blvd, Santa Ana, CA 92701, the Honorable William Claster, presiding, Plaintiffs Daniel
6 Carillo-Salazar and Evanina Alaniz will, and hereby does, move this Court to:

7 1. Preliminarily approve the settlement described in the Stipulation of Class Action
8 Settlement (attached as **Exhibit A** to the Declaration of Armond M. Jackson), which contains the
9 principal terms of the class action settlement between Plaintiff Daniel Carillo-Salazar, Plaintiff
10 Evanina Alaniz, Defendant Watermark Services, IV, LLC, Defendant Watermark Retirement
11 Communities, Inc., and Defendant Watermark Retirement Communities, LLC (collectively
12 referred to as “Watermark” or “Defendants”);

13 2. Conditionally certify the proposed Settlement Class;

14 3. Approve distribution of the proposed Notice of Class Action and Exclusion Form;

15 4. Appoint Plaintiffs Daniel Carillo-Salazar and Evanina Alaniz as the class
16 representatives;

17 5. Appoint Jackson Law, APC, Aegis Law Firm, PC and United Employees Law Group as
18 class counsels;

19 6. Appoint ILYM Group, Inc. as the settlement administrator; and

20 7. Set a hearing date for final approval of the settlement.

21 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
22 Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3)
23 the Declaration of Armond M. Jackson; (4) the Declaration of Kashif Haque; (5) the declaration of
24 Daniel Carillo-Salazar; (6) the declaration of Evanina Alaniz; (7) the Notice of Class Action Settlement;
25 (8) the [Proposed] Order Granting Preliminary Approval of the Stipulation of Class Action Settlement;
26 (9) the records, pleadings, and papers filed in this action; and (10) such other documentary and oral
27 evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: December 2, 2022

Respectfully submitted,

By: /s/ Armond M. Jackson
Armond M. Jackson, Esq.
Andrea M. Fernandez, Esq.
Anthony S. Filer Jr., Esq.
JACKSON LAW, APC
Attorneys for Plaintiff DANIEL CARILLO-
SALAZAR and all other similarly situated employees

Dated: December 2, 2022

Respectfully submitted,

By: /s/ Kristy Connolly
Kashif Haque, Esq.
Samuel A. Wong, Esq.
Jessica L. Campbell, Esq.
Kristy Connolly, Esq.

AEGIS LAW FIRM, PC
Attorneys for Plaintiff EVANINA ALANIZ and all
other similarly situated employees