

Jean-Claude Lapuyade (State Bar 248676)
JCL LAW FIRM, APC
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Tel: (619) 599-8292
Fax: (619) 599-8291
Email: jlapuyade@jcl-lawfirm.com

Shani O. Zakay, Esq. (SBN 277924)
ZAKAY LAW GROUP, APLC
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Tel: (619) 255-9047
Fax: (619) 404-9203
Email: shani@zakaylaw.com

Counsel for Plaintiff SALVADOR CHAVEZ

[Additional Counsel listed on the next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

SALVADOR CHAVEZ, in his representative
capacity on behalf of the State of California
and fellow Aggrieved Employees,

Plaintiffs,

vs.

HTL CONRAD DOMESTIC, LLC, a
Delaware limited liability company; HLT
CONRAD DOMESTIC EMPLOYER, LLC;
and DOES through 50, Inclusive,

Defendants.

Case No.: 37-2020-00016193-CU-OE-CTL

[Assigned for all purposes to Hon. John S. Meyer,
Dept. C-64]

**PLAINTIFFS' NOTICE OF MOTION TO
APPROVE THE SETTLEMENT AGREEMENT
PURSUANT TO THE LABOR CODE PRIVATE
ATTORNEYS GENERAL ACT OF 2004**

Related Case: 37-2020-00023101-CU-OE-CTL

Related Case: 37-2021-00000849-CU-OE-CTL

Date: April 29, 2022
Time: 10:30a.m.
Judge: Hon. John S. Meyer
Dept: C-64

ADDITIONAL COUNSEL

Edward W. Choi, Esq. SBN 211334
LAW OFFICES OF CHOI & ASSOCIATES, APLC
515 S. Figueroa St., Suite 1250
Los Angeles, CA 90071
Telephone: (213) 381-1515
Facsimile: (213) 465-4885
Email: edward.choi@choiandassociates.com

David Lee, Esq. SBN 296294
DAVID LEE LAW, APC
515 S. Flower Street, Suite 1900
Los Angeles, California 90071
Telephone: (213)236-3536
Facsimile: (866) 658-4722

Larry W. Lee (State Bar No. 2281750)
DIVERSITY LAW GROUP, APC
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
(213) 488-6555
(213) 488-6554 facsimile

Attorneys for Plaintiff SERGIO JIMENEZ

Mark D. Potter, Esq. SBN 166317
James M. Treglio, Esq. SBN 228077
POTTER HANDY LLP
8033 Linda Vista Rd., Suite 200
San Diego, CA 92111
Tel: (858) 375-7385
Fax: (888) 422-5191
mark@potterhandy.com
jimt@potterhandy.com

Attorneys for Plaintiff RODGER CAPPS

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

PLEASE TAKE NOTICE that on April 29, 2022, at 10:30 a.m., or as soon thereafter as the matter be heard in Department 38 of the Superior Court of the State of California for the County of San Diego located at 330 West Broadway, San Diego CA 92101, Plaintiffs Salvador Chavez, Rodger Capps, and Sergio Jimenez (“Plaintiffs”) will, and hereby do, move the Court for entry of an order approving the proposed settlement of the above-captioned civil action between Plaintiffs and Defendants HTL CONRAD DOMESTIC, LLC, a Delaware limited liability company, and HLT CONRAD DOMESTIC EMPLOYER, LLC (“Defendants”) (Plaintiffs and Defendants shall collectively be referred to as the “Parties”) under the Labor Code Private Attorneys General Act of 2004 (“PAGA”).

This motion is made pursuant to California Labor Code § 2699(l)(2), which requires trial courts to “review and approve any settlement of any civil action filed pursuant to [PAGA],” see Cal. Lab. Code § 2699(l)(2), and on the grounds that the parties’ settlement is fundamentally fair, adequate, and reasonable in light of the PAGA’s policies and purposes. As set forth in the concurrently-filed Declaration of Jean-Claude Lapuyade, a copy of the Parties’ proposed settlement was electronically submitted to the Labor and Workforce Development Agency in accordance with California Labor Code §§ 2699(l)(2) and 2699(l)(4) concurrent with the filing of this motion.

This motion is based on this notice of motion and motion for approval of the parties’ settlement agreement; the concurrently-filed memorandum of points and authorities in support of this motion; the concurrently-filed Declarations of Jean-Claude Lapuyade, Larry W. Lee, Edward W. Choi, David J. Lee, Shani O. Zakay, James M. Treglio, and Plaintiffs Salvador Chavez, Rodger Capps, and Sergio Jimenez (and all exhibits attached thereto); all pleadings, records, and files in this action; and upon such other matters as may be properly presented to, or received by, the Court at or before the hearing on this motion.

Dated: April 8, 2022

JCL LAW FIRM APC

By: 

Jean-Claude Lapuyade, Esq.