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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF DEL NORTE

REINALD PILLSBURY, an individual, on
behalf of himself and on behalf of all persons
similarly situated,,

Plaintiff,

vs.

T & T RESTAURANTS CA, INC., a
Corporation; and DOES 1 through 50,
inclusive,,

Defendant.

Case No. CVUJ-20-1214

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

Date: July 23, 2021
Time: 10:00 a.m.
Dept.: 1

*[Assigned for All Purposes to Judge Darren
McElfresh]*

Action Filed: September 8, 2020

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

PLEASE TAKE NOTICE that on July 23, 2021 at 10:00 a.m., or as soon thereafter as counsel may be heard, in the department 1 of the above-captioned Court, Plaintiff REINALD PILLSBURY will hereby move this Court to:

1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class Action Claims and Release of Claims ("Settlement Agreement"), attached as **Exhibit 1** to the Declaration of Jean-Claude Lapuyade;
2. Conditionally certify the Settlement Class;
3. Approve distribution of the proposed Notice of Class Action Settlement to the

1 Settlement Class Members;

2 4. Appoint Plaintiff REINALD PILLSBURY as the class representative;

3 5. Appoint Jean-Claude Lapuyade, Esq. of the JCL LAW FIRM, APC, and Shani O.
4 Zakay, Esq. of the ZAKAY LAW GROUP, APLC, as class counsel; and

5 6. Set a hearing date for final approval of the settlement.

6 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
7 Points and Authorities in Support of Motion for Preliminary Approval of Class Action
8 Settlement; (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O.
9 Zakay, Esq.; (5) the Settlement Agreement; (6) the [Proposed] Order Granting Preliminary
10 Approval of Class Action Settlement and exhibits attached thereto; (7) the records, pleadings,
11 and papers filed in this action; and (8) upon such other documentary and oral evidence or
12 argument as may be presented to the Court at or prior to the hearing of this Motion.

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

15
16 Dated: June 24, 2021

JCL LAW FIRM, APC

17
18 By: _____


Jean-Claude Lapuyade
Attorney for Plaintiff