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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF EL DORADO

JESSICA BARACKMAN, an individual, on
behalf of herself and on behalf of all persons
similarly situated,,

Plaintiff,

vs.

TEAZ N PLEAZ, INC., a California
Corporation dba SEDUCTIONS; and DOES 1
through 50, inclusive,

Defendant.

Case No. SC 20200179

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

Date: October 8, 2021
Time: 1:30 p.m.
Dept.: 4

*[Assigned for All Purposes to Judge Michael J.
McLaughlin]*

Action Filed: December 21, 2020

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

PLEASE TAKE NOTICE that on October 8, 2021 at 1:30 p.m., or as soon thereafter as
counsel may be heard, in the department 1 of the above-captioned Court, Plaintiff JESSICA
BARACKMAN 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 Shani O. Zakay;
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 JESSICA BARACKMAN 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 Declarations of Shani O. Zakay, Esq. and Jean-Claude Lapuyade, Esq.; (4)
9 the Settlement Agreement; (5) the [Proposed] Order Granting Preliminary Approval of Class
10 Action Settlement and exhibits attached thereto; (6) the records, pleadings, and papers filed in
11 this action; and (7) upon such other documentary and oral evidence or argument as may be
12 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).

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16 Dated: September 9, 2021

ZAKAY LAW GROUP, APC

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18 By: 
19 Shani O. Zakay
20 Attorney for Plaintiff
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