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Attorneys for Plaintiff ANGEL CHAPPARO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

ANGEL CHAPPARO, individually and on
behalf of all persons similarly situated

PLAINTIFFS,

vs.

IMMANUEL BAPTIST CHURCH OF SAN
BERNADINO AND HIGHLAND,
CALIFORNIA, a California non-profit
corporation; IMMANUEL BAPTIST
CHURCH, a California non-profit corporation,
and Does 1 through 50, Inclusive,

DEFENDANTS.

Case No. CIVSB2101240

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

Date: June 27, 2022

Time: 9:00 a.m.

Judge: Hon. David Cohn

Dept.: S-26

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

PLEASE TAKE NOTICE that on June 27, 2022, at 9:00 a.m., or as soon thereafter as counsel may be heard, in Department S-26 of the San Bernardino Superior Court, the Honorable Judge David Cohn presiding, plaintiff ANGEL CHAPPARO will, and hereby does, move this Court to:

1. Preliminarily approve the settlement described in the Class and Representative Action Settlement Agreement and Release of Claims ("Agreement") attached as Exhibit A to the Declaration of Jean-Claude Lapuyade filed concurrently herewith;

2. Conditionally certify the Settlement Class;

3. Approve distribution of the proposed Notice of Class Action Settlement to the Settlement Class;

4. Appoint Plaintiff ANGEL CHAPPARO as the Class Representative;

5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; and

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

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

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

Dated: May 20, 2022

JCL LAW FIRM, APC

By: 
Jean-Claude Lapuyade
Attorneys for Plaintiff