

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
Perssia Razma (State Bar #351398)
John L. Nitti (State Bar #330752)
Carolina Faccin (State Bar #340855)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
prazma@jcl-lawfirm.com
jnitti@jcl-lawfirm.com
cfaccin@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K Hom (State Bar #327243)
Jaclyn Joyce (State Bar #285124)
3110 Camino Del Rio S, Suite 308
San Diego, CA 92108
Telephone: (619) 255-9047
shani@zakaylaw.com
jackland@zakaylaw.com
jaclyn@zakaylaw.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

DAVID STEVENS and MICHAEL ADAMS,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiff,

v.

KAMPS PROPANE, INC., a California
Corporation; and DOES 1-50, Inclusive;

Defendants.

Case No: 37-2021-00016367-CU-OE-CTL

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

Date: May 21, 2027

Time: 9:00 a.m.

Judge: Hon. Michael T. Smyth

Dept.: C-67

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

2 PLEASE TAKE NOTICE that on May 21, 2027, at 9:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department C-67 of the San Diego Superior Court, the Honorable Judge Michael T.
4 Smyth presiding, Plaintiffs David Stevens and Michael Adams (“Plaintiffs”) will, and hereby do, move
5 this Court to:

6 1. Preliminarily approve the settlement described in the Class Action and PAGA
7 Settlement Agreement and Class Notice (“Agreement”) attached as Exhibit 1 to the Declaration of
8 Sydney Castillo-Johnson, Esq. filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class and PAGA
11 Representative Action Settlement and Final Hearing Date (“Class Notice”) attached as Exhibit A to
12 the Agreement;

13 4. Appoint Plaintiffs David Stevens and Michael Adams as the Class Representatives;

14 5. Appoint Jean-Claude Lapuyade, Esq. and Sydney Castillo-Johnson, Esq. of JCL Law
15 Firm, APC, and Shani O. Zakay, Esq. and Jackland K. Hom, Esq. of Zakay Law Group, APLC, as
16 Class Counsel; and

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

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

27
28 ///

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

3
4 Dated: September 4, 2026

JCL LAW FIRM, APC

5 By: Sydney Castillo-Johnson
6 Sydney Castillo-Johnson, Esq.
7 Attorney for Plaintiffs
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28