

JCL LAW FIRM, APC

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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

ANA RAYOS, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiff,

v.

RESTAURANT LEADERSHIP GROUP,
LLC, an unknown business entity and DOES 1
through 100, inclusive,

Defendants.

Case No. CVRI2000689

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

Date: September 24, 2024

Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept.: 1

Reservation #: 948006425521

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

2 PLEASE TAKE NOTICE that on September 24, 2024, at 8:30 a.m., or as soon thereafter as
3 counsel may be heard, in Department 1 of the Riverside Superior Court, the Honorable Judge Harold
4 W. Hopp presiding, Plaintiff ANA RAYOS will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
6 and PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the
7 Declaration of Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement,
10 Exclusion Form, Objection Form, and Final Hearing Date to the Settlement Class;

11 4. Appoint Plaintiff Ana Rayos as the Class Representative;

12 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Lawyers for Justice,
13 PC as Class Counsel; and

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

15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement; (3)
17 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 Declaration of Vartan Madoyan, Esq.; (6) the Declaration of the Plaintiff; (7) the Stipulation of
19 Settlement of Class and PAGA Action Claims and Release of Claims and exhibit attached thereto; (8)
20 the [Proposed] Order Granting Preliminary Approval of Class and PAGA Action Settlement and
21 exhibits attached thereto; (9) the records, pleadings, and papers filed in this action; and (10) upon such
22 other documentary and oral evidence or argument as may be presented to the Court at or prior to the
23 hearing of this Motion.

24 The Court will make a tentative ruling on the merits of this matter by 3:00 p.m. on the court day
25 prior to the hearing. Tentative rulings will be available on the Internet or by calling 1-760-904-5722.
26 To view go to: <http://www.riverside.courts.ca.gov> and click on the tentative ruling link. The tentative
27 ruling shall become the ruling of the Court unless, by 4:30 p.m. on the court day before the scheduled
28 hearing, a party gives notice of intent to appear to all parties and the court. The notice of intent to

1 appear must be given either in person or by telephone. Where notice of intent to appear has been
2 properly given, or upon direction of the Court, oral argument will be permitted.

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

5
6 Dated: August 29, 2024

JCL LAW FIRM, APC

7 By: Sydney Castillo-Johnson
8 Sydney Castillo-Johnson, Esq.
9 Attorneys for Plaintiff
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Court Reservation Receipt

Reservation	
Reservation ID: 948006425521	Status: RESERVED
Reservation Type: Motion for Preliminary Approval of Class Action Settlement	Number of Motions: 1
Case Number: CVRI2000689	Case Title: RAYOS vs RESTAURANT LEADERSHIP GROUP, LLC.
Filing Party: ANA RAYOS (Plaintiff)	Location: Historic Court House - Department 1
Date/Time: September 24th 2024, 8:30AM	Confirmation Code: CR-CMLLGMNUQ9LFW306

Fees			
Description	Fee	Qty	Amount
Reschedule Fee	20.00	1	20.00
Credit Card Percentage Fee (2.75%)	0.55	1	0.55
TOTAL			\$20.55

Payment	
Amount: \$20.55	Type: AmericanExpress
Account Number: XXXX1004	Authorization: 207178

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