

ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SHASTA

JAMES M. CONLEY, an individual, on behalf
of himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

SISKIYOU FOREST PRODUCTS, a
California Corporation; and DOES 1-50,
Inclusive,
Defendants.

Case No. 195819

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

Hearing Date: May 23, 2022
Hearing Time: 8:30am

Judge: Hon. Stephen H. Baker
Dept.: 3

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

2 PLEASE TAKE NOTICE that on May 23, 2022 at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 3 of the Shasta Superior Court, located at 1500 Court Street, Redding,
4 CA, 96001, the Honorable Judge Stephen H. Baker presiding, Plaintiff JAMES M. CONLEY will, and
5 hereby does, move this Court to:

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

9 2. Conditionally certify the Settlement Class;

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

12 4. Appoint Plaintiff JAMES M. CONLEY as the Class Representative;

13 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC 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 and Motion; (2) the Memorandum of Points
16 and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the
17 Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 Stipulation of Settlement of Class Action Claims and Release of Claims and exhibit attached thereto;
19 (6) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement and exhibits
20 attached thereto; (7) the records, pleadings, and papers filed in this action; and (8) upon such other
21 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
22 of this Motion.

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

25
26 Dated: April 21, 2022

ZAKAY LAW GROUP, APC

27 By: 

28 Shani O. Zakay, Esq.