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Attorneys for Plaintiff SUKHRAJ KAUR

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF CONTRA COSTA

SUKHRAJ KAUR, an individual, on behalf of
herself and on behalf of all persons similarly
situated,

Plaintiff,

vs.

ACES 2020 I, LLC, a Delaware limited liability
company (fka Comprehensive Educational
Services, Inc.), ACES 2020, LLC, a California
limited liability company (fka Comprehensive
Educational Services, Inc.); and DOES 1
through 50, inclusive,

Defendants.

Case No. MSC20-02482

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

Date: July 14, 2022

Time: 9:00 a.m.

Judge: Hon. Judge Edward G. Weil

Dept.: 39

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

2 PLEASE TAKE NOTICE that on July 14, 2022, at 9:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department 39 of the Contra Costa Superior Court, the Honorable Judge Edward G.
4 Weil presiding, plaintiff SUKHRAJ KAUR will, and hereby does, move this Court to:

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

8 2. Conditionally certify the Settlement Class;

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

11 4. Appoint Plaintiff SUKHRAJ KAUR as the Class Representative;

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

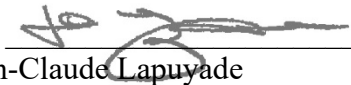
13 7. Set a hearing date for final approval of the settlement.

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

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

24
25 Dated: June 17, 2022

JCL LAW FIRM, APC

26 By: 
27 Jean-Claude Lapuyade
28 Attorneys for Plaintiff