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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

NATALI AMAYA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

LIBERTY RESIDENTIAL SERVICES,
INC., a Pennsylvania corporation; LIBERTY
HEALTHCARE CORPORATION, an
unknown business entity; LIBERTY
HEALTHCARE OF CALIFORNIA, INC., a
California corporation previously identified
as fictitious DOE 1; and DOES 2 through 100,
inclusive,

Defendants.

Case No.: 37-2022-00014913-CU-OE-CTL
(LEAD CASE)

*Consolidated with Case No.: 37-2022-
00018859-CU-OT-CTL (PAGA Action)*

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

Date: August 15, 2025

Time: 8:30 a.m.

Judge: Hon. Mark T. Cumba

Dept.: C-65

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

2 PLEASE TAKE NOTICE that on August 15, 2025, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department C-65 of the San Diego Superior Court, the Honorable Hon. Mark T.
4 Cumba presiding, Plaintiff Natali Amaya 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, Esq., 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 NATALI AMAYA 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.

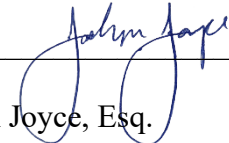
15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the
17 Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 Declaration of Joanna Ghosh, Esq.; (6) the Declaration of Natali Amaya; (7) the Declaration of the
19 Settlement Administrator; (8) the Stipulation of Settlement of Class and PAGA Action Claims and
20 Release of Claims and exhibit attached thereto; (9) the [Proposed] Order Granting Preliminary
21 Approval of Class Action Settlement and exhibits attached thereto; (10) the records, pleadings, and
22 papers filed in this action; and (11) upon such other documentary and oral evidence or argument as
23 may be presented to the Court at or prior to the hearing of this Motion.

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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 Dated: July 21, 2025

ZAKAY LAW GROUP, APLC

4 By: 
5 Jaclyn Joyce, Esq.

6 Attorney for Plaintiff
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