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Attorneys for Plaintiff RIGOBERTO ROJAS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

RIGOBERTO ROJAS, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

WEINGART CENTER ASSOCIATION, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 22STCV21995

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

Date: February 11, 2025
Time: 10:00 a.m.
Judge: Hon. Elihu M. Berle
Dept.: 6

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

2 PLEASE TAKE NOTICE that on February 11, 2025 at 10:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 6 of the Los Angeles Superior Court, the Honorable Judge Elihu
4 M. Berle presiding, plaintiff RIGOBERTO ROJAS will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action and PAGA Settlement
6 Agreement and Class Notice ("Agreement") attached as Exhibit 1 to the Declaration of Ryan Slinger,
7 filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

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

11 4. Appoint Plaintiff RIGOBERTO ROJAS as the Class Representative;

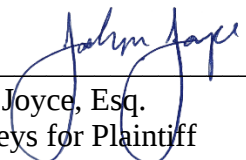
12 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Lawyers for Justice,
13 PC, as Class Counsel; and

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 and PAGA Settlement; (3)
17 the Declaration of Ryan Slinger, Esq.; (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the
18 Declaration of Shani O. Zakay, Esq.; (6) the Declaration of Chris Longley (7) the Declaration of
19 Rigoberto Rojas; (8) the Class Action and PAGA Settlement Agreement and exhibit attached thereto;
20 (9) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement and
21 exhibits attached thereto; (10) the records, pleadings, and papers filed in this action; and (11) upon
22 such other documentary and oral evidence or argument as may be presented to the Court at or prior to
23 the hearing of this Motion. As this Motion is unopposed, the Parties respectfully request relief from
24 the page limit requirement set by California Rules of Court, Rule 3.1113(d).

25 Dated: December 31, 2024

ZAKAY LAW GROUP, APLC

26 By: 
27 Jaclyn Joyce, Esq.
28 Attorneys for Plaintiff