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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

SHASTA COLLINS, on behalf of herself and
on behalf of all persons similarly situated,

Plaintiffs,

vs.

HILTON MANAGEMENT, LLC, a Delaware
limited liability company; and DOES 1 through
50, Inclusive;

Defendants.

Case No. CGC-21-590959

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

Date: August 30, 2024

Time: 9:00 a.m.

Judge: Hon. Anne-Christine Massullo

Dept.: 302

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

2 PLEASE TAKE NOTICE that on August 30, 2024 at 9:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department 302 of the San Francisco Superior Court, the Honorable Judge Anne-
4 Christine Massullo presiding, plaintiff Shasta Collins will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement, the basic terms of which are listed in the Parties'
6 fully executed Memorandum of Understanding ("MOU") attached as Exhibit 2 to the Declaration of
7 Jean-Claude Lapuyade filed concurrently herewith, and more fully outlined in the Parties' partially
8 executed Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims
9 ("Agreement") attached as Exhibit 1 to the Declaration of Jean-Claude Lapuyade filed concurrently
10 herewith;

11 2. Conditionally certify the Settlement Class;

12 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement
13 and Final Hearing Date attached as Exhibit A to the Agreement;

14 4. Appoint Plaintiff Shasta Collins as the Class Representative;

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

16 6. Set a hearing date for final approval of the settlement.

17 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
18 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
19 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
20 Declaration of Shasta Collins; (9) the partially executed Settlement Agreement and exhibit attached
21 thereto; (10) the fully executed Memorandum of Understanding; (11) the [Proposed] Order Granting
22 Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto; (12) the
23 records, pleadings, and papers filed in this action; and (13) upon such other documentary and oral
24 evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

25 Dated: August 1, 2024

JCL LAW FIRM, APC

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