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Attorneys for Plaintiff JIE XU

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

JIE XU, individually and on behalf of all
persons similarly situated,

PLAINTIFFS,

vs.

HT MULTINATIONAL, INC., a California
Corporation; CHTC (USA), INC., a California
Corporation; HT INDUSTRIES, INC., a
Corporation; and Does 1 through 50, Inclusive,

DEFENDANTS.

Case No. CIVDS 2015679

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

Date: July 15, 2022

Time: 9:00 a.m.

Judge: Hon. David Cohn

Dept.: S-26

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

2 PLEASE TAKE NOTICE that on July 15, 2022, at 9:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department S-26 of the San Bernardino Superior Court, the Honorable Judge David
4 Cohn presiding, plaintiff JIE XU 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 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 JIE XU 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 Jie Xu; (6) the Stipulation of Settlement of Class and PAGA Action Claims and
18 Release of Claims and exhibit attached thereto; (7) the [Proposed] Order Granting Preliminary
19 Approval of Class Action and PAGA Settlement and exhibits attached thereto; (8) the records,
20 pleadings, and papers filed in this action; and (9) upon such other documentary and oral evidence or
21 argument as may 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 22, 2022

JCL LAW FIRM, APC

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