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Attorneys for Plaintiff YINAN ZHANG,
individually, and on behalf of other similarly
situated employees and aggrieved employees
pursuant to the California Private Attorneys
General Act

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

YINAN ZHANG, individually, and on behalf of
other similarly situated employees and
aggrieved employees pursuant to the California
Private Attorneys General Act,

Plaintiff,

vs.

HALREC, INC. dba STEVENS CREEK
TOYOTA; and DOES 1 through 25, inclusive,
Defendants.

Case No.: 25CV463865

Honorable Beth McGowen
Department 22

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

Date: February 25, 2027
Time: 1:30 p.m.
Dept.: 22

Complaint Filed: April 17, 2025
FAC Filed: June 2, 2026
Trial Date: Not Set

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on **February 25, 2027 at 1:30 p.m.** in Department 22 of
3 the above-captioned Court located at 161 North First Street, San Jose, California 95113, pursuant to
4 California Code of Civil Procedure section 382 and Rule 3.769 of the California Rules of Court,
5 Plaintiff Yinan Zhang (“Plaintiff”) will and hereby does move the Court for an Order granting
6 preliminary approval of the proposed class action and PAGA settlement between Plaintiff and
7 Defendant Halrec, Inc. dba Stevens Creek Toyota (“Defendant”).

8 **PLEASE TAKE FURTHER NOTICE THAT** this Motion was previously noticed and
9 calendared for April 22, 2027 at 1:30 p.m. in Department 22 of the above-captioned Court. By way
10 of this Notice, all Parties are notified of the new date of the hearing.

11 Plaintiff requests that the Court enter an Order:

12 1. Preliminarily approving the Joint Stipulation of Class Action and PAGA Settlement
13 (“Settlement” or “Settlement Agreement”) attached as Exhibit 3 to the Declaration of Alexandra
14 Rose in Support of Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA
15 Settlement (“Rose Decl.”);

16 2. Certifying the Class for Settlement purposes;

17 3. Appointing Plaintiff Yinan Zhang as the Class Representative for Settlement
18 purposes;

19 4. Appointing Jonathan M. Genish, Ryan A. Quadrel, Joe Marshall, Shelby L. Miner,
20 and Alexandra Rose of Blackstone Law, APC as Class Counsel for Settlement purposes;

21 5. Approving the proposed Notice of Class Action Settlement (“Class Notice”), attached
22 as Exhibit A to the Settlement Agreement, to be mailed to the Class;

23 6. Approving the opt-out and objection procedures provided in the Settlement
24 Agreement and set forth in the Class Notice;

25 7. For each Class Member, directing Defendant to furnish their full name, last known
26 mailing address, Social Security number, dates worked for Defendant during the Class Period, and
27 such other information as is necessary for the Settlement Administrator to calculate Workweeks and
28 Pay Periods to the Settlement Administrator within fourteen (14) calendar days after entry of the

1 order granting preliminary approval of the Settlement;

2 8. Approving the proposed deadlines for the settlement administration process; and

3 9. Setting a Final Approval Hearing.

4 Pursuant to California Labor Code section 2699(s)(2), on August 14, 2026, a copy of the
5 Settlement was submitted to the California Labor and Workforce Development Agency (“LWDA”)
6 via online submission through the LWDA’s website. (Rose Decl., ¶ 50 and Exh. 4).

7 This Motion is based upon this Notice, the previously attached Memorandum of Points and
8 Authorities, the Declaration of Alexandra Rose, the Declaration of Plaintiff Yinan Zhang, the
9 Declaration of the Settlement Administrator (Jodey Lawrence of Phoenix Class Action
10 Administration Solutions), the pleadings and other records on file with the Court in this matter, and
11 any other further evidence or argument that the Court may properly receive at or before the hearing.

12 Respectfully submitted,

13 Dated: September 8, 2026

BLACKSTONE LAW, APC

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15 By: _____
16 Alexandra Rose
17 Attorney for Plaintiff Yinan Zhang
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SANTA CLARA

I, Lorena Bautista, certify and declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 8383 Wilshire Blvd, Suite 745, Beverly Hills, California 90211. On September 8, 2026, I served a copy of the following document(s):

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

on the interested parties as follows:

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m.goldstein@musickpeeler.com
Michael Mauge
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Westlake Village, CA 91361
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Attorneys for Defendant

☒ **BY ELECTRONIC MAIL (E-MAIL):** I caused said document(s) to be delivered electronically to be delivered to the above referenced addressee(s) via email from email address lbautista@blackstonepc.com pursuant to California Code of Civil Procedure section 1010.6(e)(1). I did not receive any electronic message or other indication that the transmission was unsuccessful.

☒ **BY ONLINE SUBMISSION:** The above-referenced documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(I). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 8, 2026 at Beverly Hills, California.

/s/ Lorena Bautista
Lorena Bautista