

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Eduardo Garcia (State Bar #290572)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com
egarcia@jcl-lawfirm.com

Attorneys for Plaintiff YVETTE MOLINA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

YVETTE MOLINA, an individual, on behalf
of herself and on behalf of all persons
similarly situated,

Plaintiff,

vs.

HAWAIIAN AIRLINES, INC., a
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 20STCV28079

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

Date: November 17, 2021
Time: 9:30 a.m.

Judge: Hon. Maren Nelson
Dept.: 17

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

PLEASE TAKE NOTICE that on November 17, 2021, at 9:30 a.m., or as soon thereafter as
counsel may be heard, in Department 17 of the Los Angeles Superior Court, the Honorable Judge
Maren Nelson presiding, Plaintiff YVETTE MOLINA will, and hereby does, move this Court to:

1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class

1 Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the Declaration of Jean-
2 Claude Lapuyade filed concurrently herewith;

3 2. Conditionally certify the Settlement Class;

4 3. Approve distribution of the proposed Notice of Class Action Settlement to the
5 Settlement Class;

6 4. Appoint Plaintiff YVETTE MOLINA as the Class Representative;

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

8 7. Set a hearing date for final approval of the settlement.

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

17 As this Motion is unopposed, the Parties respectfully request relief from the page limit
18 requirement set by California Rules of Court, Rule 3.1113(d).

19
20 Dated: October 25, 2021

JCL LAW FIRM, APC

21 By: 
22 Jean-Claude Lapuyade
23 Attorneys for Plaintiff
24
25
26
27
28