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8 JAVIER ARRAZOLA, and all others similarly situated

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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF LOS ANGELES**

12 **(UNLIMITED JURISDICTION)**

13 JAVIER ARRAZOLA, on behalf of himself and
14 all others similarly situated, the general public,
15 and as an “aggrieved employee” on behalf of
16 other “aggrieved employees” and the State of
California under the Labor Code Private
Attorneys General Act of 2004,

17 *Plaintiff(s),*

18 vs.

19 IRRIGATION EXPRESS, INC., a California
20 corporation, IRRIGATION EXPRESS AND
21 SIMPLE TURF, a California corporation;
YOSEF AMZALAG SUPPLY, a California
22 corporation; YOSEF AMZALAG, a natural
23 person; and DOES 1–50, inclusive,

24 *Defendant(s).*

Case No. 25STCV25534

**PLAINTIFF JAVIER ARRAZOLA’S
NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: September 16, 2026

Hearing Time: 10:00 a.m.

Hearing Dept.: SSC-15, The Honorable
Timothy P. Dillon

Action filed: August 29, 2025

**Submitted Herewith Under Separate
Cover:**

1. Memorandum of Points and Authorities;
2. Declaration(s) of David Spivak, Walter L. Haines, and Javier Arrazola; and
3. [Proposed] Order



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

2 PLEASE TAKE NOTICE that on September 16, 2026 at 10:00 a.m., or as soon thereafter
3 as the matter may be heard, in Department SSC-15 of the Los Angeles County Superior Court,
4 located at Spring Street Court, 312 N. Spring Street, Los Angeles, CA 90012, Plaintiff Javier
5 Arrazola ("Plaintiff") will and hereby does move this Court for an order: (1) granting class
6 certification of the Settlement Class solely for settlement purposes pursuant to California Code of
7 Civil Procedure section 382; (2) preliminarily approving the Class Action and PAGA Settlement
8 Agreement and Class Notice (the "Settlement")¹ between Plaintiff and defendants Yosef Amzalag
9 Supply dba Irrigation Express, Inc., and Yosef Amzalag (collectively referred to as
10 "Defendants")² (Plaintiff and Defendants are referred to below collectively as the "Parties"); (3)
11 appointing David Spivak of The Spivak Law Firm and Walter L. Haines of United Employees
12 Law Group as Class Counsel; (4) appointing Plaintiff as Class Representative ("Class
13 Representative"); (5) approving the use of the proposed notice procedures and related forms; (6)
14 directing that notice be mailed to the proposed Settlement Class; and (7) scheduling a hearing
15 date for motion for final approval of class action settlement and awards of attorneys' fees and
16 costs.

17 The "Settlement Class" or "Class Member" consists of all persons employed by
18 Defendants in California and classified as hourly, non-exempt employees who worked for
19 Defendants during the Class Period. "Class Period " means the period from August 29, 2021
20 through May 12, 2026.

21 This Motion is made on the following grounds: (1) the Settlement Class meets all the
22 requirements for class certification for settlement purposes only under California Code of Civil
23 Procedure section 382; (2) Plaintiff and his counsel are adequate to represent the Settlement Class;
24 (3) the Settlement reflects a fair, adequate, and reasonable compromise of all disputed claims in
25 view of Defendants' potential liability exposure as compared against the risks of continued

26 _____
27 ¹ The Settlement is attached as Exhibit 1 to the Declaration of David Spivak ("DS"), which is
submitted herewith under a separate cover.

28 ² Defendants claim that IRRIGATION EXPRESS, INC. and IRRIGATION EXPRESS AND
SIMPLE TURF are dissolved and no longer exist.



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1 litigation; (4) the proposed notice procedures and related forms adequately apprise the Class
2 Members of their rights under the Settlement and fully comport with due process; and (5) in view
3 of the foregoing, notice should be disseminated to the Class Members and a hearing date for
4 motion for final approval of class action settlement, and awards of attorneys' fees and costs should
5 be set.

6 The Motion is based on this Notice of Motion and Motion, the attached Memorandum of
7 Points and Authorities, the Declarations of David Spivak, Walter L. Haines, and Javier Arrazola,
8 all papers and pleadings on file with the Court in this action, all matters judicially noticeable, and
9 on such oral and documentary evidence as may be presented in connection with the hearing on
10 the Motion.

11 Respectfully submitted,

12 THE SPIVAK LAW FIRM

13
14 Dated: August 5, 2026

By: 

DAVID G. SPIVAK
CAROLINE TAHMASSIAN,
Attorneys for Plaintiff, JAVIER
ARRAZOLA, and all others similarly
situated



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