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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

MICHAEL TURINETTI, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act;

Plaintiff,

v.

GEMOLOGICAL INSTITUTE OF
AMERICA, INC., a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 37-2023-00036003-CU-OE-CTL

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

Date: April 3, 2026
Time: 10:30 a.m.

Judge: Hon. Loren Freestone
Dept.: C-64

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

2 PLEASE TAKE NOTICE that on April 3, 2026, at 10:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department C-64 of the San Diego Superior Court, the Honorable Judge Loren
4 Freestone presiding, Plaintiff Michael Turinetti ("Plaintiff") will, and hereby does, move this Court
5 to:

6 1. Preliminarily approve the settlement described in the Joint Stipulation of Settlement and
7 Release ("Agreement") attached as **Exhibit 1** to the Declaration of Shani O. Zakay filed concurrently
8 herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the Proposed Notice of Settlement of Class Action and Final
11 Approval Hearing ("Notice Packet") attached as **Exhibit A** to the Agreement;

12 4. Appoint Plaintiff Michael Turinetti as the Class Representative;

13 5. Appoint Shani O. Zakay, Esq. of Zakay Law Group, APLC, Jean-Claude Lapuyade,
14 Esq. of the JCL Law Firm, APC, and Arby Aiwazian, Esq., Joanna Ghosh, Esq Vartan Madoyan, Esq.,
15 and Helene Mayer, Esq., of Lawyers for Justice, PC as Class Counsel; and

16 6. Set a hearing date for final approval of the settlement.
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1 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
2 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
3 the Declaration of Shani O. Zakay, Esq.; (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the
4 Declaration of Helene Mayer, Esq.; (6) the Declaration of the Settlement Administrator; (7) the
5 Agreement and Notice Packet attached thereto; (8) the [Proposed] Order Granting Preliminary
6 Approval of Class Action and PAGA Settlement and exhibits attached thereto; (9) the records,
7 pleadings, and papers filed in this action; and (10) upon such other documentary and oral evidence or
8 argument as may be presented to the Court at or prior to the hearing of this Motion.

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

11 Dated: March 11, 2026

ZAKAY LAW GROUP, APLC

12 By: Nicole Noursamadi
13 Nicole Noursamadi, Esq.
14 Attorneys for PLAINTIFF
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