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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ELIJAH WOLDEMARIAM, individually, and
on behalf of other members of the general
public similarly situated;

Plaintiff,

v.

ALL NIPPON AIRWAYS CO., LTD., a
Japanese corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 23STCV29685

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

Date: April 23, 2026

Time: 10:30 a.m.

Judge: Theresa M. Traber

Dept.: 1

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

2 PLEASE TAKE NOTICE that on April 23, 2026, at 10:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 1 of the Los Angeles Superior Court, the Honorable Judge Theresa M.
4 Traber presiding, plaintiff ELIJAH WOLDEMARIAM will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action and PAGA
6 Settlement Agreement (“Agreement”) attached as Exhibit 1 to the Declaration of Shani O. Zakay, Esq.
7 filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Class Notice;

10 4. Appoint Plaintiff ELIJAH WOLDEMARIAM as the Class Representative;

11 5. Appoint JCL Law Firm, APC; Zakay Law Group, APLC; and Lawyers *for* Justice, PC
12 as Class Counsel; and

13 6. Set a hearing date for final approval of the settlement.

14 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
15 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
16 the Declaration of Shani O. Zakay, Esq., (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the
17 Declaration of Lawyers *for* Justice, PC; (7) the Declaration of the Administrator; (8) the Class Action
18 and PAGA Settlement Agreement and exhibit attached thereto; (9) the [Proposed] Order Granting
19 Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto; (10) the
20 records, pleadings, and papers filed in this action; and (11) upon such other documentary and oral
21 evidence or 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 Dated: January 16, 2026

ZAKAY LAW GROUP, APLC

25 By: /s/ Nicole Noursamadi
26 Nicole Noursamadi, Esq.

27 Attorney for PLAINTIFF
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