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Attorneys for Plaintiffs
ALEXANDRIA EATON

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ALAMEDA

ALEXANDRIA EATON and REBECCA
WAKEMAN, as aggrieved employees
pursuant to the Labor Code Private
Attorneys Act of 2004 ("PAGA"), on
behalf of the State of California and other
aggrieved employees,

Plaintiffs,

v.

THE GAP, INC., GPS CONSUMER
DIRECT, INC., and DOES 2 through 10
inclusive,

Defendants.

ALEXANDRIA EATON, on behalf of
herself and on behalf of all persons
similarly situated,

Plaintiff,

v.

THE GAP, INC., GPS CONSUMER
DIRECT, INC. and DOES 1 to 10,

Defendants.

Related Cases:

CASE NO. RG21104093

CASE NO. 23CV045852

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

Reservation ID: 861167392284

DATE: December 3, 2024

TIME: 1:30 p.m.

DEPT: 21

Complaints filed:

June 16, 2021

September 27, 2023

1 PLEASE TAKE NOTICE THAT on December 3, 2024 at 1:30 p.m. in Department
2 21 of the above-captioned Court, located at 1221 Oak Street, Oakland, California, 94612,
3 Plaintiff Alexandria Eaton will move the Court for an order granting preliminary approval of
4 the class action and PAGA settlement between Plaintiff and Defendants The Gap, Inc. and
5 GPS Consumer Direct, Inc. Plaintiff will request the Court (1) preliminarily approve the
6 proposed settlement memorialized in the Joint Stipulation of Class and PAGA Action
7 Settlement (“Settlement Agreement”) attached as Exhibit 1 to the Declaration of Marita M.
8 Lauinger; (2) conditionally certify the proposed Settlement Classes; (3) appoint Plaintiff
9 Alexandria Eaton as the class representative and her counsel as class counsel; (4) appoint
10 CPT Group, Inc. as the settlement administrator; (5) approve and authorize the mailing of the
11 class notice attached as Exhibit A to the Settlement Agreement; and (6) set the date for the
12 final approval and fairness hearing.

13 This motion is based on this notice, the Memorandum of Points and Authorities filed
14 herewith, the Declaration of Marita M. Lauinger and the exhibits thereto, the Declaration of
15 Julie Green on behalf of CPT Group, Inc., the Declaration of Katie Briscoe, and all pleadings
16 and papers filed in this matter, and on such other further evidence that may be presented at
17 the time of the hearing.

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19 Dated: November 6, 2024

CLAPP & LAUINGER LLP

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21 JAMES F. CLAPP
22 MARITA MURPHY LAUINGER
23 Attorneys for Plaintiff
24 ALEXANDRIA EATON
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