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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ALEXIS BARTRAM and LOURDES
CONTRERAS, individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

v.

LAKESHORE LEARNING MATERIALS,
LLC, a California limited liability company;
and DOES 1-50, Inclusive,

Defendant.

Case No: 23STCV21174

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

Date: March 5, 2025

Time: 9:00 a.m.

Judge: Hon. Lauren A. Seigle

Dept.: 17

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

2 PLEASE TAKE NOTICE that on March 5, 2025, at 9:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department 17 of the Los Angeles Superior Court, the Honorable Judge Lauren A.
4 Seigle presiding, Plaintiff Alexis Bartram and Plaintiff Lourdes Contreras (“Plaintiffs”) will, and
5 hereby does, move this Court to:

6 1. Preliminarily approve the settlement described in the Class Action and PAGA
7 Settlement Agreement (“Agreement”) attached as Exhibit 1 to the Declaration of Jean-Claude
8 Lapuyade filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class and PAGA
11 Representative Action Settlement and Final Hearing Date (“Class Notice”) attached as Exhibit A to
12 the Agreement;

13 4. Appoint Plaintiffs Alexis Bartram and Lourdes Contreras as Class Representatives;

14 5. Appoint Jean-Claude Lapuyade, Esq. of the JCL Law Firm, APC, and Shani O. Zakay,
15 Esq. of Zakay Law Group, APLC, as Class Counsel; and

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

17 7. This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points
18 and Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement;
19 (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5)
20 the Declaration of Alexis Bartram; (6) the Declaration of Lourdes Contreras; (7) the Declaration of
21 the Settlement Administrator; (8) the Agreement and Class Notice attached thereto; (9) the [Proposed]
22 Order Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits attached
23 thereto; (10) the records, pleadings, and papers filed in this action; and (11) upon such other
24 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
25 of this Motion.

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

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4 Dated: January 22, 2025

JCL LAW FIRM, APC

5 By: Sydney Castillo-Johnson
6 Sydney Castillo-Johnson, Esq.
7 Attorneys for PLAINTIFFS
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