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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

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

Plaintiffs,

v.

AMERICAN ALL CARE SERVICES
HOSPICE, INC., a California Corporation; and
DOES 1-50, Inclusive,

Defendants.

Case No. 24STCV00055

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

Date: August 1, 2025

Time: 10:30 a.m.

Judge of the Superior Court

Dept.: 1

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

2 PLEASE TAKE NOTICE that on August 1, 2025, 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 Stuart M.
4 Rice presiding, plaintiff EDYTHE GUZMAN 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 EDYTHE GUZMAN as the Class Representative;

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

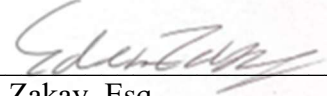
13 7. Set a hearing date for final approval of the settlement.

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 Edythe Guzman; (7) the Declaration of the Administrator; (8) the Class Action and
18 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
25 Dated: July 9, 2025

ZAKAY LAW FIRM, APLC

26 By: 
27 Eden Zakay, Esq.

28 Attorney for PLAINTIFF