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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

LANDON HARPER, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General Act,

Plaintiff,

vs.

XCLUSIVE WIRELESS RESOURCES, LLC,
a California limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Lead Case No. STK-CV-UOE-2024-1658
Consolidated with Case No: STK-CV-OUE-
2024-1666

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

Date:
Time:
Dept.: 10D

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

2 PLEASE TAKE NOTICE that as soon as counsel may be heard, in Department 10D of the San
3 Joaquin Superior Court, Plaintiff Landon Harper will, and hereby does, move this Court to:

4 1. Preliminarily approve the Class Action and PAGA Settlement and Release
5 (“Settlement”), attached as Exhibit 1 to the Declaration of Shani O. Zakay, Esq. filed concurrently
6 herewith. The basic terms of the Settlement are outlined in the fully executed Memorandum of
7 Understanding (“MOU”), attached as Exhibit 2 to the Declaration of Shani O. Zakay, Esq. filed
8 concurrently herewith.

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class and Representative
11 Action Settlement and Final Hearing Date, attached as Exhibit A to the Agreement;

12 4. Appoint Plaintiff Landon Harper as the Class Representative;

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

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

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

25 Dated: July 31, 2026

ZAKAY LAW GROUP, APLC

26 By: /s/ Nicole Noursamadi
27 Nicole Noursamadi, Esq.
28 Attorneys for Plaintiff