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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF NEVADA**

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

Plaintiff,
vs.

BRIARPATCH COOPERATIVE OF
NEVADA, INC., a California corporation;
BRIARPATCH FOOD CO-OP, an unknown
business entity; NEVADA COUNTY
BRIARP, an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No. CU0001207

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

Date: June 20, 2025
Time: 10:00 a.m.

Judge: Hon. Robert Tice-Raskin
Dept.: 6

LAWYERS *for* JUSTICE, PC
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1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on June 20, 2025, at 10:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department 6 of the Nevada County Superior Court, the Honorable Judge Robert
4 Tice-Raskin presiding, Plaintiff AMANDA POWELL will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Class Action and
6 PAGA Settlement and Release of Claims ("Agreement") attached as Exhibit 1 to the Declaration of
7 Jennifer M. Gerstenzang, Esq. filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Class Notice;

10 4. Appoint Plaintiff AMANDA POWELL 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

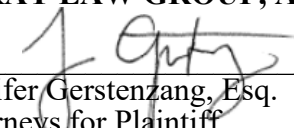
13 7. Set a hearing date for final approval of the settlement.

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 Jennifer M. Gerstenzang, Esq.; (4) the Declaration of Jean-Claude Lapuyade, Esq.;
17 (5) the Declaration of Shani O. Zakay, Esq.; (6) the Declaration of Brian J. St. John, Esq.; (7) the
18 Declaration of Amanda Powell; (8) the Declaration of the Administrator; (9) the Stipulation of Class
19 Action and PAGA Settlement and Release of Claims ("Agreement") and exhibit attached thereto; (10)
20 the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement and
21 exhibits attached thereto; (11) the records, pleadings, and papers filed in this action; and (12) upon
22 such other documentary and oral evidence or argument as may be presented to the Court at or prior to
the hearing of this Motion.

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

25 Dated: April 28, 2025

ZAKAY LAW GROUP, APLC

26 By: 
27 Jennifer Gerstenzang, Esq.
28 Attorneys for Plaintiff