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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

LERE GARRETT, an individual, on behalf of
themselves, and on behalf of all persons similarly
situated,

Plaintiff,

v.

CORE ANALYTICS RADIOLOGY, INC., a
California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No: 24CV103976

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

Date: January 28, 2026

Time: 1:30 p.m.

Reservation ID: 081232582528

Judge: Hon. Patrick McKinney

Dept.: 18

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

2 PLEASE TAKE NOTICE that on January 28, 2026, at 1:30 p.m., or as soon thereafter as
3 counsel may be heard, in Department 18 of the Alameda County Superior Court, Rene C. Davidson
4 Courthouse, the Honorable Judge Patrick McKinney presiding, plaintiff Lere Garrett, will, and hereby
5 does, move this Court to:

6 1. Preliminarily approve the settlement described in the Class Action and PAGA
7 Settlement Agreement and Class Notice ("Agreement") attached as Exhibit 1 to the Declaration of
8 Shani O. Zakay, Esq. filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve the form and distribution of the proposed Notice of Class Action Settlement
11 and Hearing Date for Final Court Approval;

12 4. Appoint Plaintiff Lere Garrett as the Class Representative;

13 5. Appoint JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; and

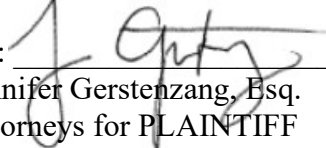
14 6. Set a hearing date for final approval of the settlement.

15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
17 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 Declaration of Lere Garrett; (6) the Declaration of the Settlement Administrator; (7) the Agreement
19 and exhibit attached thereto; (8) the [Proposed] Order Granting Preliminary Approval of Class Action
20 and PAGA Settlement and exhibits attached thereto; (9) the records, pleadings, and papers filed in this
21 action; and (10) upon such other documentary and oral evidence or argument as may be presented to
22 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: December 22, 2025

ZAKAY LAW GROUP, APLC

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