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(Additional Counsel on Next Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

BRANDYN SCOTTO and ANGEL
RODRIGUEZ, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiffs,

vs.

COVI CONCRETE CONSTRUCTION, INC.,
a California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 30-2023-01351136-CU-OE-CXC

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

Dept.: CX102

Judge: Layne H. Melzer

Date: September 11, 2025

Time: 2:00 p.m.

Reservation No. 74583065

1 **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 September 11, 2025, at 2:00 p.m. or as soon thereafter as
3 counsel may be heard, in the department CX102 of the above-captioned Court, Plaintiff BRANDYN
4 SCOTTO will hereby move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Settlement of
6 Class and PAGA Action Claims and Release of Claims (“Settlement Agreement”), attached as
7 Exhibit 1 to the Declaration of Jean-Claude Lapuyade;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Class and PAGA Action Settlement to
10 the Settlement Class Members;

11 4. Appoint Plaintiffs BRANDYN SCOTTO and ANGEL RODRIGUEZ as the class
12 representatives;

13 5. Appoint Shani O. Zakay, Esq. of Zakay Law Group, APLC, Jean-Claude Lapuyade,
14 Esq. of JCL Law Firm, APC, Edwin Aiwazian, Esq., Arby Aiwazian, Esq., Joanna Ghosh Esq., and
15 Vartan Madoyan, Esq. of Lawyers for Justice, PC, and Kane Moon, Esq., Lilit Ter-Astvatsatryan,
16 Esq., and Michael Citrin, Esq. of Moon Law Group, PC as class counsel; and

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

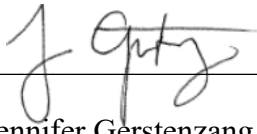
18 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
19 Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement;
20 (3) the Declaration of Shani O. Zakay, Esq.; (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5)
21 the Declaration of Vartan Madoyan, Esq of Lawyers for Justice, PC; (6) the Declaration of Kane
22 Moon of Moon Law Group, PC; (7) the Declaration from the Settlement Administrator; (8) the
23 Settlement Agreement; (9) the [Proposed] Order Granting Preliminary Approval of Class Action
24 Settlement and exhibits attached thereto; (10) the records, pleadings, and papers filed in this action;
25 and (11) upon such other documentary and oral evidence or argument as may be presented to the
26 Court at or prior to the hearing 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: June 9, 2025

ZAKAY LAW GROUP, APLC

5 By: 
6 Jennifer Gerstenzang, Esq.

7 Attorney for Plaintiff
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Jennifer Heming

From: donotreply@occourts.org
Sent: Monday, June 9, 2025 3:52 PM
To: Jennifer Heming
Subject: Superior Court of California, County of Orange - Motion Reservation Request - CONFIRMATION

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THE SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

Reserve a Motion Date

Your reservation request has been CONFIRMED by the Superior Court. The hearing date and time below has been reserved. You will be asked to provide your reservation number to the court at a later date.

MOVING PAPERS MUST BE E-FILED WITHIN 24 HOURS AFTER COMPLETING THE ON-LINE RESERVATION. Failure to submit your moving papers within 24 hours will result in the automatic CANCELLATION of the reservation.

NOTE: To expedite your motion, please place the appropriate Court Reservation number (e.g. 7XXXXXXX) on each Motion being submitted. If multiple motions are submitted on one document, all reservations numbers must be listed on the face page of the pleading.

Please do not reply to this email.

Reservation Number: 74583065

Hearing Date: September 11, 2025
Hearing Time: 2:00 PM
Department: CX102
Motion Type: Motion - Other

Case Number: 30-2023-01351136-CU-OE-CXC
Case Title: Scotto vs. Covi Concrete Construction, Inc.
Judicial Officer: Layne H. Melzer

Email: jheming@jcl-lawfirm.com
Requestor Name: Jean-Claude Lapuyade
Requestor Phone: 6195998292

Filing Party: BRANDYN SCOTTO

Date of Request: June 09, 2025

Time of Request: 3:51 PM

Transaction Number: 1000553416

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