

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)

shani@zakaylaw.com

Jennifer Gerstenzang (State Bar #279810)

jenny@zakaylaw.com

Eden Zakay (State Bar #339536)

eden@zakaylaw.com

Jaclyn Joyce (State Bar #285124)

jaclyn@zakaylaw.com

3110 Camino del Rio S, Suite 308

San Diego, CA 92108

Telephone: (619) 255-9047

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)

jlapuyade@jcl-lawfirm.com

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 599-8292

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

RACHAEL LIEBREGT, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

WORLD COURIER INC., a New York
corporation; WORLD CUSTOMS
BROKERAGE, INC., a Delaware corporation;
and DOES 1-50, Inclusive,

Defendants.

Case No. 24STCV05865

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

Date: July 8, 2026

Time: 10:00 a.m.

Judge: Hon. David S. Cunningham III

Dept.: 11

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on July 8, 2026, or as soon
3 thereafter as the matter can be heard, in Department 11 of the above-entitled Court, before the
4 Honorable Judge David S. Cunningham III, Plaintiff RACHAEL LIEBREGT (“Plaintiff”) will
5 apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2)
6 Entry of the Final Approval Order and Judgment.

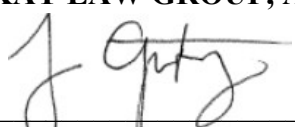
7 This Motion is brought in accordance with the Preliminary Approval Order dated
8 December 2, 2025, and California Rules of Court, rule 3.769. This Motion will be based on this
9 notice, the accompanying points and authorities, the Class Action and PAGA Settlement
10 Agreement (“Agreement”), the Declaration of Shani O. Zakay, the Declaration of Jean-Claude
11 Lapuyade, the Declaration of Norma Ayala (the Administrator), the Declaration of Plaintiff
12 Rachael Liebrecht, and the complete files and records in this action.

13 Because all parties have agreed to the proposed class settlement and have met and
14 conferred regarding the motion, this motion is not opposed by Defendants. To date, there have
15 been zero (0) requests for exclusion and zero (0) objections submitted by the Class.

16 Respectfully submitted,

17
18 Dated: June 9, 2026

ZAKAY LAW GROUP, APLC

19
20 By: 
Jennifer Gerstenzang, Esq.

21 Attorney for PLAINTIFF
22
23
24
25
26
27
28