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Attorneys for Plaintiff RACHAEL LIEBREGT

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 PRELIMINARY
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: October 28, 2025

Time: 10:00 a.m.

Judge: Hon. David S. Cunningham III
Dept.: S11

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

2 PLEASE TAKE NOTICE that on October 28, 2025, at 10:00 a.m. or as soon thereafter as
3 counsel may be heard, in Department S11 of the Los Angeles Superior Court, the Honorable David S.
4 Cunningham III presiding, Plaintiff Rachael Liebrecht will, and hereby, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action and PAGA
6 Settlement Agreement and Class Notice, (hereinafter "Settlement Agreement") attached as Exhibit 1
7 to the Declaration of Jean-Claude Lapuyade, Esq., filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

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

11 4. Appoint Plaintiff Rachael Liebrecht as the Class Representative;

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

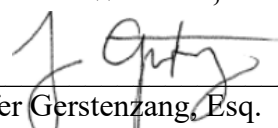
13 6. Set a hearing date for final approval of the settlement.

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
16 Agreement; (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay,
17 Esq.; (5) the Declaration of Plaintiff Rachael Liebrecht; (6) the Declaration of Andrew P. Frederick,
18 Esq.; (7) the Declaration of Chris Rider, Esq.; (8) the Declaration of Sean Hartranft (Settlement
19 Administrator); (9) the Settlement Agreement and exhibit attached thereto; (10) the [Proposed] Order
20 Granting Preliminary Approval of Class Action and PAGA Settlement Agreement and exhibits
21 attached thereto; 11) the records, pleadings, and papers filed in this action; and (12) upon such other
22 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
23 of this Motion.

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

26 Dated: May __, 2025

ZAKAY LAW FIRM, APLC

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