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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

LONYAI CAMACHO, individually, and on behalf of other members of the general public similarly situated; and TERESA TURNER on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiffs,

v.

EYECARE SERVICES PARTNERS MANAGEMENT, LLC, a Delaware limited liability company; INLAND EYE SPECIALISTS, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No. CVRI2203096

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

Date: May 15, 2026

Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept.: 1

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

2 PLEASE TAKE NOTICE that on May 15, 2026, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 1 of the Riverside Superior Court, the Honorable Judge Harold W. Hopp
4 presiding, Plaintiffs LONYAI CAMACHO, and TERESA TURNER will, and hereby do, move this
5 Court to:

6 1. Preliminarily approve the settlement described in the Class Action and PAGA
7 Settlement Agreement (“Agreement” or “Settlement Agreement”) attached as Exhibit 1 to the
8 Declaration of Vartan Madoyan, Esq. filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement,
11 Exclusion Form, Objection Form, and Final Hearing Date to the Settlement Class;

12 4. Appoint Plaintiff Lonyai Camacho as the Class Representative;

13 5. Appoint Lawyers for Justice, PC, JCL Law Firm, APC and Zakay Law Group, APLC
14 as Class Counsel; and

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

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

25 The Court will make a tentative ruling on the merits of this matter by 3:00 p.m. on the court day
26 prior to the hearing. Tentative rulings will be available on the Internet or by calling 1-760-904-5722.
27 To view go to: <http://www.riverside.courts.ca.gov> and click on the tentative ruling link. The tentative
28 ruling shall become the ruling of the Court unless, by 4:30 p.m. on the court day before the scheduled

1 hearing, a party gives notice of intent to appear to all parties and the court. The notice of intent to
2 appear must be given either in person or by telephone. Where notice of intent to appear has been
3 properly given, or upon direction of the Court, oral argument will be permitted.

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

6
7 Dated: April 21, 2026

JCL LAW FIRM APC

8 By: Perssia Razma
9 Perssia Razma, Esq.
10 Attorneys for PLAINTIFFS
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