

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
Rachel N. Newman (State Bar #350826)
Jennifer Gerstenzang (State Bar #279810)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
shani@zakaylaw.com
jackland@zakaylaw.com
rachel@zakaylaw.com
jenny@zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com

LAWYERS for JUSTICE, P.C.

Selena Matavosian (State Bar #348044)
410 West Arden Avenue, Suite 203
Glendale, CA 91203
Telephone: (818) 265-1020
Facsimile: (818) 265-1021
selena@calljustice.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF KERN

PASSION MORRIS, an individual, on behalf
of herself and on behalf of all persons similarly
situated,

Plaintiff,

v.

HABERFELDE FORD, a California
corporation; JIM BURKE FORD LINCOLN,
an unknown business entity; and DOES 1
through 100, Inclusive,

Defendants.

Case No. BCV-23-100471

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

Date: January 17, 2025
Time: 8:30 a.m.

Judge: Hon. Thomas S. Clark
Dept.: 17

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on January 17, 2025, or as soon
3 thereafter as the matter can be heard, in Department 17 of the above-entitled Court, before the
4 Honorable Judge Thomas S. Clark, Plaintiff PASSION MORRIS (“Plaintiff”) will apply for an order
5 granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final
6 Approval Order and Judgment.

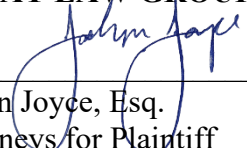
7 This Motion is brought in accordance with the Preliminary Approval Order dated August
8 13, 2024, and California Rules of Court, Rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action
10 Claims and Release of Claims (“Agreement” or “Settlement Agreement”), the Declaration of Jean-
11 Claude Lapuyade, the Declaration of Shani O. Zakay, the Declaration of Selena Matavosian, the
12 Declaration of Sean Hartranft, (the Settlement Administrator), the Declaration of the Plaintiff, and
13 the complete files and records in this action.

14 Because all parties have agreed to the proposed class settlement and have met and conferred
15 regarding the motion, this motion is not opposed by Defendants. To date, there have been no
16 objections submitted by the Class.

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18 Respectfully submitted,

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20 Dated: December 23, 2024

ZAKAY LAW GROUP, APLC

21 By: 
22 Jaclyn Joyce, Esq.
23 Attorneys for Plaintiff
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