

ZAKAY LAW GROUP, APLC
Shani O. Zakay (State Bar #277924)
shani@zakaylaw.com
Eden Zakay (State Bar #339536)
eden@zakaylaw.com
Jennifer Gerstenzang (State Bar #279810)
jenny@zakaylaw.com
Nicole Noursamadi (State Bar #357246)
nicole@zakaylaw.com
Jaclyn Joyce (State Bar #285124)
jaclyn@zakaylaw.com
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
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 SAN DIEGO

LINDSEY M. MACK, an individual, on behalf
of herself, and on behalf of all persons
similarly situated,

Plaintiff,

v.

MAYO FOUNDATION FOR MEDICAL
EDUCATION AND RESEARCH, a
Minnesota corporation; MAYO CLINIC, a
Minnesota corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No: 25CU018710C

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

Date: September 24, 2026
Time: 9:10 a.m.

Judge: Hon. Judy S. Bae
Dept.: C-62

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

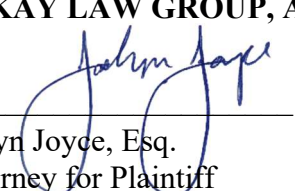
2 YOU ARE HEREBY NOTIFIED THAT at 9:10 a.m. on September 24, 2026, or as soon
3 thereafter as the matter can be heard, in Department C-62 of the above entitled Court, before the
4 Honorable Judge Judy S. Bae, Lindsey M. Mack (“Plaintiff”) will apply for an order (1)
5 preliminarily approving the proposed settlement of this class and PAGA action with Defendants
6 Mayo Foundation for Medical Education and Research and Mayo Clinic (“Defendants”); (2)
7 approving the form and method for providing class-wide notice; (3) directing that notice of the
8 proposed settlement be given to the class; and (4) scheduling a final approval hearing date to
9 consider Plaintiff’s motion for final approval of the settlement and entry of the Judgment, and
10 Plaintiff’s motion for approval of attorneys’ fees, litigation expenses, and the Service Award.

11 This motion for preliminary approval of the class settlement is brought pursuant to
12 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of motion
13 and motion, the accompanying points and authorities, the Declaration of Shani O. Zakay, Esq., the
14 Declaration of Jean Claude Lapuyade, Esq., the Declaration of the Parties’ Settlement
15 Administrator, the declaration of Plaintiff, the Stipulation of Class Action and PAGA Settlement
16 And Release of Claims (“Agreement”) between the parties, and the complete files and records in
17 this action. All parties have agreed to the proposed class settlement and have met and conferred
18 regarding the motion; therefore, this motion is not opposed by Defendants.

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21 DATED: February 20, 2026

Respectfully submitted,

ZAKAY LAW GROUP, APLC

22 By: 
23 Jaclyn Joyce, Esq.
24 Attorney for Plaintiff
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