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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

MAHARI SMITH, an individual, in his
representative capacity on behalf of the State of
California, as a private attorney general,

Plaintiff,

vs.

NORTH SACRAMENTO HEALTHCARE,
LLC, d.b.a. NORTH POINTE CARE
CENTER, a California limited liability
company; and DOES 1-50, Inclusive,

Defendants.

Case No.: 25CV002151

**NOTICE OF MOTION AND MOTION TO
APPROVE PAGA SETTLEMENT**

Date: August 21, 2026

Time: 9:00 a.m.

Judge: Hon. Jill H. Talley

Dept: 8A

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

2 YOU ARE HEREBY NOTIFIED THAT on August 21, 2026, at 9:00 a.m. or as soon as this
3 matter may be heard in Courtroom 8A of the above-entitled Court before the Honorable Judge Jill H.
4 Talley, Plaintiff MAHARI SMITH ("Plaintiff") will apply for an order approving the California
5 Labor Code Private Attorneys General Act ("PAGA") settlement in accordance with Labor Code
6 §2699(s). The proposed settlement is set forth in the accompanying PAGA Settlement Agreement
7 (the "Settlement Agreement").

8 This motion will be based on this notice of motion and motion, the accompanying points and
9 authorities, the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq.,
10 the Declaration of the Plaintiff, the Declaration of the Settlement Administrator, the Settlement
11 Agreement between the parties, and the complete files and records in this action. All Parties have
12 approved the Settlement Agreement and have met and conferred regarding the motion; therefore, this
13 motion is not opposed by Defendant. The Labor Workforce Development Agency has been served
14 with this motion and the Settlement Agreement as set forth in the accompanying Declaration Shani
15 O. Zakay. As this Motion is unopposed, the Parties respectfully request relief from the page limit
16 requirement set by California Rules of Court, Rule 3.1113(d).

17 DATED: July 27, 2026

ZAKAY LAW GROUP, APLC

19 By: 

20 Jaelyn Joyce, Esq.

21 Attorney for PLAINTIFF
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