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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

SHANE ANDERSEN and MICHAEL
GAUQUIER, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

TERRA VISTA MANAGEMENT, INC., a
California corporation; CAMPLAND, LLC, a
Delaware limited liability company; DE ANZA
SAN DIEGO FOOD AND BEVERAGE, INC.,
a California corporation; DE ANZA
CORPORATION, a California corporation;
BAYSIDE VILLAGE MARINA LLC, a
California limited liability company; and DOES
1-50, Inclusive,

Defendants.

Case No: 24CU006415C

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

Date: March 13, 2022

Time: 10:30 a.m.

Judge: Hon. Loren Freestone

Dept.: C-64

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

2 PLEASE TAKE NOTICE that on March 13, 2026, at 10:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department C-64 of the San Diego Superior Court, the Honorable Judge Loren
4 Freestone presiding, Plaintiffs Shane Andersen and Michael Gauquier ("Plaintiffs") will, and hereby
5 doe move this Court to:

6 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
7 and PAGA Action Claims and Release of Claims ("Agreement") attached as Exhibit 1 to the
8 Declaration of Shani O. Zakay filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class and Representative
11 Action Settlement and Final Hearing Date ("Class Notice") attached as Exhibit A to the Agreement;

12 4. Appoint Plaintiffs Shane Andersen and Michael Gaunquier as the Class Representatives;

13 5. Appoint Jean-Claude Lapuyade, Esq. of the JCL Law Firm, APC, Shani O. Zakay, Esq.
14 of Zakay Law Group, APLC, and Nicholas Ferraro, Esq. of Ferraro Vega Employment Lawyers, Inc
15 as Class Counsel; and

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

17 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
18 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
19 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq; (5) the
20 Declaration of Nicholas Ferraro, Esq.; (6) the Declaration of the Settlement Administrator; (7) the
21 Declaration of Shane Andersen; (8) the Declaration of Michael Gauquier; (9) the Agreement and Class
22 Notice attached thereto; (10) the [Proposed] Order Granting Preliminary Approval of Class Action
23 and PAGA Settlement and exhibits attached thereto; (11) the records, pleadings, and papers filed in
24 this action; and (12) upon such other documentary and oral evidence or argument as may be presented
25 to the Court at or prior to the hearing of this Motion.

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

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4 Dated: February 19, 2026

ZAKAY LAW GROUP, APLC

5 By: 
6 Jaclyn Joyce, Esq.
7 Attorneys for Plaintiff
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