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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

SARAH ARREDONDO, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiff,

v.

VENDOR DIRECT SOLUTIONS, LLC, a
California limited liability company; VENDOR
DIRECT CAPITAL SERVICES. LLC, a
California limited liability company; and
DOES 1-50, Inclusive,

Defendants.

Case No. 25STCV00317

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

Date: February 2, 2027

Time: 10:00 a.m.

Judge: Hon. Samantha Jessner

Dept.: 7

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

2 PLEASE TAKE NOTICE that on February 2, 2027, at 10:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 7 of the Los Angeles Superior Court, the Honorable Samantha
4 Jessner presiding, plaintiff SARAH ARREDONDO will, and hereby does, move this Court to:

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

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Class Notice;

10 4. Appoint Plaintiff SARAH ARREDONDO as the Class Representative;

11 5. Appoint the JCL Law Firm, APC; and Zakay Law Group, APLC as Class Counsel; and

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

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

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

23
24 Dated: September 10, 2026

ZAKAY LAW GROUP, APLC

25 By: Nicole Noursamadi
26 Nicole Noursamadi, Esq.
27 Attorney for PLAINTIFF
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