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Attorneys for Plaintiffs, AJEET S. RAM and LATOSHA
DEHART, on behalf of themselves and all others similarly
situated and aggrieved

(Additional Counsel on Next Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

AJEET S. RAM and LATOSHA DEHART,
individuals, and on behalf of all others similarly
situated and aggrieved,

Plaintiffs,

v.

PACTIV PACKAGING, INC., a Delaware
corporation; EVERGREEN PACKAGING
LLC, a Delaware limited liability company;
PACTIV LLC, a Delaware limited liability
company; PACTIV EVERGREEN GROUP
HOLDINGS INC., a Delaware corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No. STK-CV-UOE-2022-9879

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

Date:

Time:

Judge: Hon. Jayne Lee

Department: 10C

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Attorneys for Plaintiffs, AJEET S. RAM and LATOSHA
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situated and aggrieved

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

2 PLEASE TAKE NOTICE that as soon as counsel may be heard in Department 10C of the San
3 Joaquin Superior Court, the Honorable Jayne Lee presiding, plaintiffs AJEET S. RAM and LATOSHA
4 DEHART (“Plaintiffs”) will, and hereby do, move this Court to:

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

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class and Representative
10 Action Settlement and Final Hearing Date to the Class;

11 4. Appoint Plaintiffs Latosha Dehart and Ajeet Ram as the Class Representatives;

12 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Bibiyan Law Group,
13 P.C. as Class Counsel; and

14 7. Set a hearing date for final approval of the settlement.

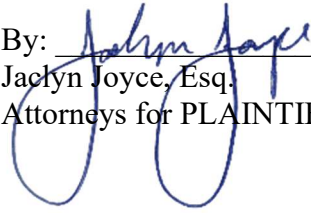
15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement; (3)
17 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 Declaration of David Bibiyan; (6) the Declaration of Plaintiff Latosha Dehart; (7) the Declaration of
19 Plaintiff Ajeet Ram; (8) the Declaration of the Claims Administrator; (9) the Stipulation of Settlement
20 of Class and PAGA Action Claims and Release of Claims and exhibit attached thereto; (10) the
21 [Proposed] Order Granting Preliminary Approval of Class and PAGA Action Settlement and exhibits
22 attached thereto; (11) the records, pleadings, and papers filed in this action; and (12) upon such other
23 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
24 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: April 24, 2026

ZAKAY LAW GROUP, APLC

5 By: 
6 Jacklyn Joyce, Esq.
7 Attorneys for PLAINTIFF
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