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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

STEVE CAZARES, an individual, in his
representative capacity on behalf of the State
of California and fellow Aggrieved
Employees,

Plaintiff,

v.

C&M MOTORS, LLC., a limited liability
corporation, d/b/a I-10 Toyota; I-10 AUTO
MALL DEALERS ASSOCIATION and
DOES 1-50, Inclusive,

Defendants.

Case No.: CVRI2401830

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION TO APPROVE PAGA
SETTLEMENT**

Hearing Date: September 16, 2025
Hearing Time: 8:30 A.M.

Judge: Hon. Harold W. Hopp
Dept.: 1
Reservation ID: 036202263572

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 A.M. on September 16, 2025, or as soon
3 thereafter as the matter can be heard, in Department 1 of the above-entitled Court, before the
4 Honorable Harold W. Hopp, Plaintiff Steve Cazares (“Plaintiff”), pursuant to Labor Code Section
5 2699(s)(2), will apply for an Order Approving the parties’ PAGA Settlement and entry of the agreed-
6 upon Proposed Final Judgment, which are filed concurrently herewith. Defendant has advised that
7 they do not oppose Plaintiff’s Motion.

8 This unopposed Motion will be made on the grounds that the proposed PAGA Settlement is
9 fair, adequate, reasonable, and in the best interests of the State of California and the Aggrieved
10 Employees. This Motion will be based on this notice, the accompanying points and authorities, the
11 Declarations of Shani O. Zakay, Esq., Jean-Claude Lapuyade, Esq., plaintiff Steve Cazares, and the
12 Parties’ Administrator, and the complete files and records in this action.

13 Plaintiff respectfully requests that, pursuant to the specific terms (including timing and
14 manner) as set forth in the executed Stipulation of Settlement of PAGA Action and Release of PAGA
15 Claims (the “Settlement Agreement”) and assuming conditions are met therein, the Court (1) grant
16 approval of the Parties’ PAGA Settlement; (2) appoint Apex Class Action LLC as the Claims
17 Administrator; (3) direct that the agreed-upon Notice of PAGA Settlement be approved and sent to
18 the allegedly Aggrieved Employees with their settlement checks in the manner set forth in the
19 Settlement Agreement; (4) award PAGA Counsel their fees’ and litigation costs; and (5) award
20 Plaintiff his Service Award. Plaintiff also requests that the Court sign and enter the proposed PAGA
21 Settlement Approval Order and Final Judgment, filed concurrently herewith.

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1 The Court will make a tentative ruling on the merits of this matter by 3:00 p.m. on the court
2 day prior to the hearing. Tentative rulings will be available on the Internet or by calling 1-760-904-
3 5722. To view go to: <http://www.riverside.courts.ca.gov> and click on the tentative ruling link. The
4 tentative ruling shall become the ruling of the Court unless, by 4:30 p.m. on the court day before the
5 scheduled hearing, a party gives notice of intent to appear to all parties and the court. The notice of
6 intent to appear must be given either in person or by telephone. Where notice of intent to appear has
7 been properly given, or upon direction of the Court, oral argument will be permitted.

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9 Dated: September 8, 2025

ZAKAY LAW GROUP, APLC

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11 By: _____

Jaclyn Joyce, Esq.

Attorneys for Plaintiff

Court Reservation Receipt

Reservation	
Reservation ID: 036202263572	Status: RESERVED
Reservation Type: Motion for Approval of PAGA Settlement	Number of Motions: 1
Case Number: CVRI2401830	Case Title: CAZARES vs C&M MOTORS, LLC.
Filing Party: STEVE CAZARES (Plaintiff)	Location: Historic Court House - Department 1
Date/Time: September 16th 2025, 8:30AM	Confirmation Code: CR-8FX8MNJMJ7ATDPLNX

Fees			
Description	Fee	Qty	Amount
Motion for Approval of PAGA Settlement	0.00	1	0.00
TOTAL			\$0.00

Payment	
Amount: \$0.00	Type: NOFEE

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