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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

RAHMEEZ JACKSON and ALONDRA
MANZO ESPINOSA, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

GNC HOLDINGS LLC, a California limited
liability company; GNC LIVE WELL LLC, A
Delaware limited liability company; and DOES
1-50, Inclusive,

Defendants

Case No.: 24CV000627

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

Hearing Date: February 13, 2026
Hearing Time: 9:00 a.m.
Department: 23

Trial Date: June 8, 2026
Action Filed: January 16, 2024

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on February 13, 2026, or as soon
3 thereafter as the matter can be heard, in Department 23 of the above entitled Court, before the
4 Honorable Jill H. Talley, Plaintiff RAHMEEZ JACKSON and Plaintiff ALONDRA MANZO
5 ESPINOSA (collectively, “Plaintiffs”) will apply for an order (1) preliminary approving the
6 proposed Class and PAGA Action Settlement against Defendants GNC HOLDINGS LLC and GNC
7 LIVE WELL LLC (“Defendants”); (2) approving the form and method for providing class-wide
8 notice; (3) directing that notice of the proposed settlement be given to the class; and (4) scheduling
9 a final approving hearing date to consider Plaintiffs’ motion for final approval of the settlement and
10 entry of the Judgment, and Plaintiffs’ motion for approval of a Class Counsel Award.

11 This Motion for Preliminary Approval of the Class and PAGA Action Settlement is brought
12 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of
13 motion, the accompanying points and authorities, the Declaration of Shani O. Zakay, Esq., Jean-
14 Claude Lapuyade, Esq., the Declaration of Elliot Siegel, Esq., and the Declaration of Navid
15 Barahmand, Esq., the Declaration of RAHMEEZ JACKSON, the Declaration of ALONDRA
16 MANZO ESPINOSA, the Stipulation of Settlement of Class and PAGA Action Claims and Release
17 of Claims (“Agreement”) between the Parties, and the complete files and records in this action. All
18 Parties have agreed to the proposed Class and PAGA Action Settlement and have met and conferred
19 regarding the motion; therefore, this motion is not opposed by Defendants.

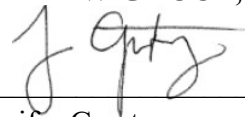
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1 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this
2 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings for
3 the department may be downloaded from the public portal. If you do not have online access, you
4 may call the dedicated phone number for the department as referenced in the local telephone
5 directory, between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the hearing and
6 listen to the tentative ruling. If you do not call the court and the opposing party by 4:00 p.m. the
7 court day before the hearing, no hearing will be held.

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9 DATED: January 16, 2026

ZAKAY LAW GROUP, APLC

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11 By:  _____

Jennifer Gerstenzang, Esq.
Attorney for Plaintiff