

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
jlapuyade@jcl-lawfirm.com
Sydney Castillo-Johnson (State Bar #343881)
scastillo@jcl-lawfirm.com
John L. Nitti (State Bar #330752)
jnitti@jcl-lawfirm.com
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
shani@zakaylaw.com
Nicole Noursamadi (State Bar #357246)
nicole@zakaylaw.com
Jaclyn Joyce (State Bar #285124)
jaclyn@zakaylaw.com
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

SIXTO ALEGRIA FERNANDEZ, an
individual, on behalf of himself, and on behalf
of all persons similarly situated,

Plaintiff,

v.

HILTON GRAND VACATIONS COMPANY,
LLC, a Delaware limited liability company,
HILTON RESORTS CORPORATION dba
HILTON GRAND VACATIONS, a Delaware
stock corporation, HILTON GRAND
VACATIONS CLUB, LLC, a Delaware limited
liability company; and DOES 1-50, Inclusive,

Defendants.

Case No. CVRI2402069

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

Date: July 28, 2025
Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp
Dept.: 1

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

2 PLEASE TAKE NOTICE that on July 28, 2025, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 1 of the Riverside Superior Court, the Honorable Judge Harold W. Hopp
4 presiding, Plaintiff SIXTO ALEGRIA FERNANDEZ will, and hereby does, move this Court to:

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

8 2. Conditionally certify the Settlement Class;

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

11 4. Appoint Plaintiff Sixto Alegria Fernandez as the Class Representative;

12 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC; and

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

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

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

properly given, or upon direction of the Court, oral argument will be permitted.

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

Dated: June 27, 2025

ZAKAY LAW GROUP, APLC

By: Nicole Noursamadi

Nicole Noursamadi, Esq.

Attorneys for PLAINTIFF