

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
Julieann Alvarado (State Bar #334727)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com
julieann@zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF NEVADA

TIFFANY BRITTON and KAYJHONNIE
SMITH, individually, and on behalf of other
members of the general public similarly situated,

Plaintiffs,

vs.

MOUNTAIN VALLEY CHILD AND FAMILY
SERVICES, INC., a California Corporation; and
DOES 1 through 100, Inclusive,

Defendants.

Case No. CU0000023

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

Date: September 15, 2023

Time: 10:00 a.m.

Judge: Hon. S. Robert Tice-Raskin
Dept.: 6

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

2 PLEASE TAKE NOTICE that on September 15, 2023, at 10:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 6 of the Nevada County Superior Court, 201 Church St., Nevada
4 City, CA 95959, the Honorable Judge S. Robert Tice-Raskin presiding, plaintiffs TIFFANY
5 BRITTON and KAYJHONNIE SMITH will, and hereby do, move this Court to:

6 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
7 and PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the
8 Declaration of Jean-Claude Lapuyade filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice Packet to the Settlement Class;

11 4. Appoint Plaintiffs TIFFANY BRITTON and KAYJHONNIE SMITH as the Class
12 Representatives;

13 5. Appoint Lawyers for Justice, PC, JCL Law Firm, APC and Zakay Law Group, APLC
14 as Class Counsel; and

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

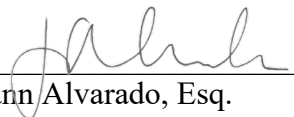
16 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
17 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
18 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
19 Declaration of Sean Hartranft of Apex Class Action LLC in Support of Plaintiffs’ Motion for
20 Preliminary Approval of Class Action and PAGA Settlement; (6) the Declaration of Tiffany Britton;
21 (7) the Declaration of Kayjhonnies Smith; (8) the Stipulation of Settlement of Class and PAGA Action
22 Claims and Release and exhibit attached thereto; (9) the [Proposed] Order Granting Preliminary
23 Approval of Class Action and PAGA Settlement and exhibits attached thereto; (10) the records,
24 pleadings, and papers filed in this action; and (11) upon such other documentary and oral evidence or
25 argument as may be presented to the Court at or prior to the hearing 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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5 Dated: August 22, 2023

ZAKAY LAW GROUP, APLC

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8 By: 
9 Julieann Alvarado, Esq.
Attorneys for Plaintiff
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