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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

LISA MUNOZ, an individual, on behalf of Plaintiff, and on behalf of all persons similarly situated,

Plaintiff,

v.

HI PRO, INC., a California corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. CIVSB2536842

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

Date: May 10, 2027
Time: 8:30am

Judge: Hon. Thomas S. Garza
Dept.: S-27

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

PLEASE TAKE NOTICE that on May 10, 2027, at 8:30 a.m., or as soon thereafter as counsel may be heard, in Department S-27 of the San Bernardino Superior Court, the Honorable Judge Thomas S. Garza presiding, Plaintiff LISA MUNOZ will, and hereby does, move this Court to:

1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims ("Agreement") attached as Exhibit A to the Declaration of Shani O. Zakay filed concurrently herewith;

2. Conditionally certify the Settlement Class;

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

4. Appoint Plaintiff LISA MUNOZ as the Class Representative for the Settlement Class;

5. Appoint Shani O. Zakay, Esq., Jaclyn M. Joyce, Esq., Eden Zakay, Esq., and Jennifer Gerstenzang, Esq. of Zakay Law Group, APLC, as Class Counsel; and

6. Set a hearing date for final approval of the settlement.

This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3) the Declaration of Shani O. Zakay, Esq.; (4) the Declaration of Plaintiff Lisa Munoz; (5) the Stipulation of Settlement of Class Action and PAGA Claims and Release of Claims and exhibit attached thereto; (6) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto; (7) the records, pleadings, and papers filed in this action; and (8) such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

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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: October 29, 2026

ZAKAY LAW GROUP, APLC

By: _____
Jackland K. Hom, Esq.
Attorneys for Plaintiff