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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

CRYSTAL JOURDEN, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiff,

v.

7-ELEVEN, INC., a Texas corporation; and
DOES 1-50, Inclusive,

Defendants.

Case No. 37-2023-00055846-CU-OE-CTL

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

Date: October 31, 2025

Time: 10:15 a.m.

Judge: Hon. Wendy M. Behan

Dept.: 66

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:15 a.m. on October 31, 2025, or as soon
3 thereafter as the matter can be heard, in Department 66 of the above-entitled Court, before the
4 Honorable Wendy M. Behan, Plaintiff Crystal Jourden (“Plaintiff”) will apply for an order granting (1)
5 Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final Approval Order
6 and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated April 28,
8 2025, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Class Action and PAGA Settlement Agreement and
10 Amendment No. 1 to the Class Action and PAGA Settlement Agreement (collectively hereinafter
11 “Agreement”), the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Shani O. Zakay,
12 Esq., the Declaration of Manny Starr, Esq., the Declaration of Sepideh Ardestani, Esq., the Declaration
13 of Roman Otkupman, Esq., the Declaration of Stacey Shim (the Administrator), the Declaration of the
14 Plaintiff, and the complete files and records in this action.

15 Because all parties have agreed to the proposed class settlement and have met and conferred
16 regarding the motion, this motion is not opposed by Defendant. To date, there have been no objections
17 submitted by the Class.

18 Respectfully submitted,

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20 Dated: October 7, 2025

JCL LAW FIRM, APC

21 By: Perssia Razma
22 Perssia Razma, Esq.
23 Attorneys for Plaintiff
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