

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo Johnson (State Bar #343881)
Perssia Razma (State Bar #351398)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
prazma@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
shani@zakaylaw.com

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

JOSE RUELAS, an individual, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

SEA WEST SERVICES LLC, a California
limited liability company; and DOES 1-50,
Inclusive,

Defendants.

Case No: 23CV038585

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

Date: November 12, 2024

Time: 1:30 p.m.

Reservation ID: 534837948725

Judge: Hon. Noël Wise

Dept.: 21

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

2 PLEASE TAKE NOTICE that on November 12, 2024, at 1:30 p.m., or as soon thereafter as
3 counsel may be heard, in Department 21 of the Alameda Superior Court, the Honorable Judge Noël
4 Wise, plaintiff JOSE RUELAS, 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 A to the
7 Declaration of Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Settlement of Class and Representative
10 Action to the Settlement Class;

11 4. Appoint Plaintiff JOSE RUELAS, as the Class Representative;

12 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; 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 Action and PAGA Settlement; (3)
16 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
17 Declaration of Jose Ruelas; (6) the Declaration of the Settlement Administrator; (7) the Agreement
18 and exhibit attached thereto; (8) the [Proposed] Order Granting Preliminary Approval of Class Action
19 and PAGA Settlement and exhibits attached thereto; (9) the records, pleadings, and papers filed in this
20 action; and (10) upon such other documentary and oral evidence or argument as may be presented to
21 the Court at or prior to the hearing of this Motion.

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

24 Dated: October 17, 2024

JCL LAW FIRM, APC

25 By: Perssia Razma
26 Perssia Razma, Esq.
27 Attorneys for PLAINTIFF
28



Superior Court of Alameda County Public Portal

Court Reservation Receipt

Reservation

Reservation ID: 534837948725	Status: RESERVED
Reservation Type: Motion re: (Preliminary Approval of Class Action and PAGA Settlement)	Number of Motions: 1
Case Number: 23CV038585	Case Title: RUELAS vs SEA WEST SERVICES LLC
Filing Party: Jose Ruelas (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 21
Date/Time: November 12th 2024, 1:30PM	Confirmation Code: CR-S74STVTOGDNYMXT8S

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	.00	1	.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: Visa
Account Number: XXXX9291	Authorization: 01304G
Payment Date: 2024-07-18	

[◀ Back to Main](#)[🖨 Print Page](#)[Terms of Service](#)[Contact Us](#)[About this Site](#)

