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(Additional Counsel on Next Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

CALVIN WATSON, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

vs.

PIER 39, LP, a California limited partnership;
and DOES 1 through 100, inclusive,

Defendants.

Case No. CGC-23-608701

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

Date: June 5, 2026

Time: 10:00 a.m.

Judge: Hon. Ethan P. Schulman

Dept.: 304

HEARING DATE AND TIME HAS BEEN
PRE-APPROVED BY DEPARTMENT 304

Joanna Ghosh, Esq. (State Bar #272479)
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Attorneys for PLAINTIFF

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

2 PLEASE TAKE NOTICE that on June 5, 2026, at 10:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department 304 of the San Francisco County Superior Court, Plaintiff Calvin Watson
4 (“Plaintiff”) will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Joint Stipulation of Class Action
6 and PAGA Settlement (“Agreement”) attached as Exhibit 1 to the Declaration of Vartan Madoyan,
7 Esq. filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class and Representative
10 Action Settlement and Final Hearing Date, attached as Exhibit A to the Agreement;

11 4. Appoint Plaintiff Calvin Watson as the Class Representative;

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

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

15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
17 the Declaration of Vartan Madoyan, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 Declaration of Jean-Claude Lapuyade, Esq.; (6) the Declaration of the Settlement Administrator, (7)
19 the Class Action and PAGA Settlement Agreement and exhibit attached thereto; (8) the [Proposed]
20 Order Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits attached
21 thereto; (9) the records, pleadings, and papers filed in this action; and (10) upon such other
22 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
23 of this Motion. As this Motion is unopposed, the Parties respectfully request relief from the page limit
24 requirement set by California Rules of Court, Rule 3.1113(d).

25 Dated: January 30, 2026

ZAKAY LAW GROUP, APLC

26 By: 
27 Jaclyn Joyce, Esq.
28 Attorneys for Plaintiff

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