

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
Perssia Razma (State Bar #351398)
John L. Nitti (State Bar #330752)
Carolina Faccin (State Bar #340855)
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
jnitti@jcl-lawfirm.com
cfaccin@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K Hom (State Bar #327243)
Jaclyn Joyce (State Bar #285124)
3110 Camino Del Rio S, Suite 308
San Diego, CA 92108
Telephone: (619) 255-9047
shani@zakaylaw.com
jackland@zakaylaw.com
jaclyn@zakaylaw.com

Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

DENISE FLORES and AMANDA HICKS,
individuals, on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

v.

J & P ASSET MANAGEMENT INC., an Ohio
Corporation; J&P HOSPITALITY
MANAGEMENT, LLC, an Ohio Limited
Liability Company; and DOES 1-50, Inclusive,

Defendants

Case No: CIVSB2407059

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

Date: February 18, 2027

Time: 8:30am

Judge: Hon. Michael Sachs

Dept.: S28

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

2 PLEASE TAKE NOTICE THAT on February 18, 2027, at 8:30 a.m. or as soon as this matter
3 may be heard in Department S28 of the San Bernardino Superior Court, the Honorable Judge Michael
4 Sachs presiding, plaintiffs Denise Flores and Amanda Hicks will, and hereby does, move this Court
5 to:

6 1. Preliminarily approve the settlement described in the Class Action and PAGA
7 Settlement Agreement and Class Notice ("Agreement") attached as **Exhibit 1** to the Declaration of
8 Sydney Castillo-Johnson, Esq., filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Class Notice;

11 4. Appoint Plaintiffs Denise Flores and Amanda Hicks as the Class Representatives;

12 5. Appoint Jean-Claude Lapuyade, Esq. and Sydney Castillo-Johnson, Esq. of JCL Law
13 Firm, APC, and Shani O. Zakay, Esq. and Jackland K. Hom, Esq. of Zakay Law Group, APLC, as
14 Class Counsel;

15 6. Set a hearing date for Plaintiffs' Motion for Final Approval; and

16 7. Set a hearing date for Plaintiffs' Motion for Attorneys' Fees and Litigation Costs and
17 Class Representative Payment.

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1 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
2 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the Class
3 Action and PAGA Settlement Agreement and Release exhibit attached thereto; (4) the Declaration of
4 Sydney Castillo-Johnson, Esq.; (5) the Declaration of Jean-Claude Lapuyade, Esq.; (6) the Declaration
5 of Shani Zakay, Esq.; (7) the Declaration of Denise Flores; (8) the Declaration of Amanda Hicks; (9)
6 the Declaration of the Settlement Administrator; (10) the [Proposed] Order Granting Preliminary
7 Approval of Class Action and PAGA Settlement and exhibits attached thereto; (11) the records,
8 pleadings, and papers filed in this action; and (12) upon such other documentary and oral evidence or
9 argument as may be presented to the Court at or prior to the hearing of this Motion.

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

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13 Dated: September 30, 2026

JCL LAW FIRM, APC

14 By: Sydney Castillo-Johnson
15 Sydney Castillo-Johnson, Esq.
16 Attorney for PLAINTIFFS
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