

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
jlapyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
prazma@jcl-lawfirm.com
jnitti@jcl-lawfirm.com
cfaccin@jcl-lawfirm.com
Attorneys for Plaintiffs
(Additional Counsel on Next Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JOSEPH GONZALEZ, KEVIN CLEMENTE,
JAMES HARDEN, and GHAZI SANKARI
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiff,

v.

OREMOR AUTOMOTIVE GROUP, LLC;
OREMOR EUROPEAN, LLC D/B/A
MERCEDES BENZ OF EL CAJON;
ROMERO AUTOMOTIVE, INC.; OREMOR
DEVELOPMENT, LLC; OREMOR
FINANCIAL SERVICES, LLC; OREMOR
OF CAPISTRANO, LLC; OREMOR OF
FONTANA, LLC; OREMOR OF FRESNO,
LLC; OREMOR OF GLENDALE, LLC;
OREMOR OF ITALY II, LLC; JEEP
CHRYSLER OF ONTARIO, INC.; OREMOR
OF ONTARIO EN, LLC; OREMOR OF
ONTARIO JCDR, LLC; OREMOR OF
RIVERSIDE RC, LLC; OREMOR OF
RIVERSIDE, LLC; OREMOR OF
TEMECULA LX LLC; OREMOR OF
TEMECULA, LLC; OREMOR OF TUSTIN,
LLC; OREMOR OF VICTORVILLE, LLC;
OREMOR OF WOODLAND HILLS, LLC;
OREMOR ONTARIO DODGE, INC.;
ROMERO MOTORS, LLC; OREMOR
MANAGEMENT & INVESTMENT
COMPANY; ROMERO MOTORS
CORPORATION; J. MCCULLOUGH
CORP; UNITED RECOVERY, INC.;

Case No. 37-2024-00019752-CU-OE-CTL

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

Date: August 14, 2026
Time: 9:00 a.m.

Judge: Hon. Michael D. Washington
Dept.: C-73

ACQUIRECORP'S NORWALK AUTO
AUCTION; and DOES 1 through 50,
inclusive,

Defendants.

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, Suite 308

San Diego, CA 92108

Telephone: (619) 255-9047

shani@zakaylaw.com

jackland@zakaylaw.com

jaclyn@zakaylaw.com

Nicholas J. Ferraro (State Bar No. 306528)

Lauren N. Vega (State Bar No. 306525)

Ferraro Vega Employment Lawyers, Inc.

3333 Camino del Rio South, Suite 300

San Diego, California 92108

(619) 693-7727 main / (619) 350-6855 facsimile

nick@ferrarovega.com / lauren@ferrarovega.com

Attorneys for Plaintiffs

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on August 14, 2026, or as soon
3 thereafter as the matter can be heard, in Department C-73 of the above-entitled Court, before the
4 Honorable Judge Michael D. Washington, Plaintiffs JOSEPH GONZALEZ, KEVIN
5 CLEMENTE, JAMES HARDEN, and GHAZI SANKARI (“Plaintiffs”) will apply for an order
6 will apply for an order granting (1) Final Approval of the Class and PAGA Action Settlement, and
7 (2) Entry of the Final Approval Order and Judgment.

8 This Motion is brought in accordance with the Preliminary Approval Order dated March
9 16, 2026, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Amended Class Action and PAGA Action Settlement
11 (hereinafter the “Agreement”), the Declaration of Jean-Claude Lapuyade, the Declaration of Shani
12 O. Zakay, the Declaration of Nicholas Ferraro, the Declaration of Beth Paris, (the Settlement
13 Administrator), the Declaration of the Plaintiffs, and the complete files and records in this action.

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

17 Respectfully submitted,

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19 DATED: July 20, 2026

JCL LAW FIRM, APC

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21 By: _____

22 John L. Nitti, Esq.
23 Attorney for Plaintiffs
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