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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF FRESNO

AMANDA VASQUEZ, an individual, on
behalf of herself and on behalf of all persons
similarly situated,

Plaintiffs,

v.

MICARE CALIFORNIA, P.C., a California
corporation; EMPLOYEE BENEFIT
MANAGEMENT SERVICES, LLC, a
Delaware limited liability company;
IMAGINE 360 ADMINISTRATORS, LLC,
a Texas limited liability company; IMAGINE
360 LLC, a Delaware limited liability
company; and DOES 1-50, Inclusive,

Defendants.

Case No. 22CECG01242

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

Date: May 2, 2024

Time: 3:27 p.m.

Judge: Hon. Jeffrey Y. Hamilton, Jr

Dept.: 503

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

2 PLEASE TAKE NOTICE that on May 2, 2024, at 3:27 p.m., or as soon thereafter as counsel
3 may be heard, in Department 503 of the Fresno Superior Court, the Honorable Judge Jeffrey Hamilton
4 presiding, Plaintiff Amanda Vasquez 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 1 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 Class Notice to the Settlement Class;

10 4. Appoint Plaintiff AMANDA VASQUEZ as the Class Representative;

11 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; and

12 7. Set a hearing date for final approval of the settlement.

13 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
14 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
15 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
16 Declaration of Plaintiff Amanda Vasquez; (6) the Declaration of Settlement Administrator
17 representative Sean Hartranft; (7) the Class Action and PAGA Settlement Agreement and exhibit
18 attached thereto; (8) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA
19 Settlement and exhibits attached thereto; (9) the records, pleadings, and papers filed in this action; and
20 (10) upon such other documentary and oral evidence or argument as may be presented to the Court at
21 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: April 9, 2024

JCL LAW FIRM, APC

25 By: Perssia Razma
26 Perssia Razma
27 Attorneys for Plaintiff
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