

JCL LAW FIRM, APC

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

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Nicole Noursamadi (State Bar #357246)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
shani@zakaylaw.com
nicole@zakaylaw.com

Attorneys for Plaintiff AMANDA VASQUEZ

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,

Plaintiff,

v.

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

Defendants.

Case No.: 23CECG01242

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

Hearing Date: January 16, 2025
Hearing Time: 3:27 p.m.

Judge: Hon. Jeffrey Hamilton
Dept: 503

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

2 YOU ARE HEREBY NOTIFIED THAT at 3:30 p.m. on January 16, 2025, or as soon
3 thereafter as the matter can be heard, in Department 503 of the above-entitled Court before the
4 Honorable Judge Jeffrey Hamilton, Plaintiff AMANDA VASQUEZ (“Plaintiff”) will move for an
5 order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the
6 Final Approval Order and Judgment.

7 This motion is brought in accordance with the Order dated August 22, 2024, and California
8 Rules of Court, Rule 3.769. This Motion will be based on this notice, the accompanying points and
9 authorities, the Declaration of Jean-Claude Lapuyade, the Declaration of Shani O. Zakay, the
10 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims (collectively
11 referred to as the (“Agreement”), the Declaration of Katherine Rovertoni (the Settlement
12 Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

13 Because Plaintiff and Defendants MICARE CALIFORNIA, P.C. and EMPLOYEE
14 BENEFIT MANAGEMENT SERVICES, LLC (“Defendants”) have agreed to the proposed class
15 settlement and have met and conferred regarding the motion, this motion is not opposed. There have
16 been no objections submitted by the Class.

17
18
19 DATED: December 20, 2024

Respectfully submitted,

ZAKAY LAW GROUP, APLC

20
21 By: Nicole Noursamadi
Nicole Noursamadi, Esq.

22 Attorney for PLAINTIFF
23
24
25
26
27
28