

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)

shani@zakaylaw.com

Jackland K. Hom (State Bar #327243)

jackland@zakaylaw.com

Jennifer Gerstenzang (State Bar #279810)

jenny@zakaylaw.com

Nicole Noursamadi (State Bar #357246)

nicole@zakaylaw.com

Jaclyn Joyce (State Bar #285124)

jaclyn@zakaylaw.com

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 255-9047

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)

jlapuyade@jcl-lawfirm.com

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 599-8292

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF CONTRA COSTA

ZHI H. HUANG, an individual, in his
representative capacity on behalf of the State of
California and fellow Aggrieved Employees,

Plaintiff,

vs.

HUTCHINSON MOTORS, INC., a California
corporation; MICHAEL C. STEAD, INC., a
California corporation; MICHAEL STEAD'S
AUTO DEPOT, INC., a California corporation;
and DOES 1-50, Inclusive,

Defendants

Case No: C23-01698

**NOTICE OF MOTION TO APPROVE
PAGA SETTLEMENT**

Date:

Time:

Judge: Hon. Edward G Weil

Dept: 39

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

2 YOU ARE HEREBY NOTIFIED THAT on _____, 2026 at _____ a.m./p.m.
3 or as soon as this matter may be heard in Department 39 of the above-entitled Court before the
4 Honorable Judge Edward G Weil, Plaintiff Zhi H. Huang (“Plaintiff”) will apply for an order
5 approving the California Labor Code Private Attorneys General Act (“PAGA”) settlement in
6 accordance with Labor Code §2699(s). The proposed settlement is set forth in the accompanying
7 Stipulation of Settlement of PAGA Action and Release of PAGA Claims (the “Settlement
8 Agreement”).

9 This motion will be based on this notice of motion and motion, the accompanying points and
10 authorities, the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq.,
11 the Declaration of the Plaintiff, the Declaration of the Settlement Administrator, the Settlement
12 Agreement between the parties, and the complete files and records in this action. All parties have
13 approved the Settlement Agreement and have met and conferred regarding the motion; therefore, this
14 motion is not opposed by Defendant. The Labor Workforce Development Agency has been served
15 with this motion and the Settlement Agreement as set forth in the accompanying Declaration of Jean-
16 Claude Lapuyade. As this Motion is unopposed, the Parties respectfully request relief from the page
17 limit requirement set by California Rules of Court, Rule 3.1113(d).

18 DATED: December 10, 2025

ZAKAY LAW GROUP, APLC

20 By: _____

Jaclyn Joyce, Esq.
Attorney for PLAINTIFF