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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

MARINA GONZALEZ and KATHERINE
HALLUM, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

ORTHOPAEDIC AND NEUROLOGICAL
REHABILITATION, SPEECH
PATHOLOGY, INC., a California corporation;
ORTHOPAEDIC AND NEUROLOGICAL
REHABILITATION, INC., a California
corporation; EMPOWERME WELLNESS,
LLC, a Missouri limited liability company; and
DOES 1-50, Inclusive,

Defendants.

Case No: 23CV033481

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

Date: June 24, 2025

Time: 10:00 a.m.

Reservation ID: A-33481-001

Judge: Hon. Michael Markman

Dept.: 23

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

2 PLEASE TAKE NOTICE that on June 24, 2025, at 10:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department 23 of the Alameda County Superior Court, the Honorable Judge Michael
4 Markman presiding, plaintiffs Marina Gonzalez and Katherine Hallum, will, and hereby doe, move
5 this Court to:

6 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
7 and PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit 1 to the
8 Declaration of Jean-Claude Lapuyade, Esq. filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve the distribution of the proposed Notice of Pendency of Class and
11 Representative Action Settlement and Final Hearing Date;

12 4. Appoint Plaintiffs Marina Gonzalez and Katherine Hallum as the Class Representatives;

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

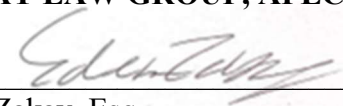
14 7. Set a hearing date for final approval of the settlement.

15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
17 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 Declaration of Marina Gonzalez; (6) the Declaration of Katherine Hallum; (7) the Declaration of the
19 Settlement Administrator; (8) the Agreement and exhibit attached thereto; (9) the [Proposed] Order
20 Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto;
21 (10) the records, pleadings, and papers filed in this action; and (11) upon such other documentary and
22 oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

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

25 Dated: May 30, 2025

ZAKAY LAW GROUP, APLC

26 By: 
27 Eden Zakay, Esq.
28 Attorneys for PLAINTIFF