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Attorneys for Plaintiff WALADIN SNOW

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

WALADIN SNOW, an individual, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

LEE'S SANDWICHES INTERNATIONAL,
INC., a California corporation; CBET
CORPORATION, a California corporation,
previously identified as fictitious DOES 1;
LEE'S SANDWICHES, an unknown business
entity, previously identified as fictitious DOES
2; and DOES 3-50, Inclusive,

Defendants.

Case No. 23CV410621

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

Date: March 12, 2025

Time: 1:30 PM

Judge: Hon. Theodore C. Zayner
Dept.: D19

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

2 PLEASE TAKE NOTICE that on March 12, 2025, at 1:30 PM, or as soon thereafter as counsel
3 may be heard, in Department D19 of the Santa Clara Superior Court, the Honorable Judge Theodore
4 C. Zayner presiding, plaintiff Waladin Snow 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 Notice of Pendency of Class Action Settlement
10 and Final Hearing Date attached as Exhibit A to the Agreement;

11 4. Appoint Plaintiff Waladin Snow as the Class Representative;

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

13 6. Set a hearing date for final approval of the settlement.

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

JCL LAW FIRM, APC

26 By: 
27 Jean-Claude Lapuyade
28 Attorneys for Plaintiff