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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JUNE GARCIA, an individual, on behalf of
herself and on behalf of all persons similarly
situated,

Plaintiff,

v.

HILTON RESORTS CORPORATION, a
Delaware corporation; HILTON GRAND
VACATIONS COMPANY, LLC, a Delaware
limited liability company; HILTON GRAND
VACATIONS MANAGEMENT, LLC, a
Nevada limited liability company; and DOES
1-50, Inclusive,

Defendants.

Case No: 37-2023-00024664-CU-OE-CTL

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

Date: February 21, 2025

Time: 10:30 a.m.

Judge: Hon. Loren Freestone

Dept.: C-64

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

2 PLEASE TAKE NOTICE that on February 21, 2025, at 10:30 a.m., or as soon thereafter as
3 counsel may be heard, in Department C-64 of the San Diego Superior Court, the Honorable Judge
4 Loren Freestone presiding, Plaintiff June Garcia ("Plaintiff") will, and hereby does, move this Court
5 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 filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class and PAGA
11 Representative Action Settlement and Final Hearing Date ("Class Notice") attached as Exhibit A to
12 the Agreement;

13 4. Appoint Plaintiff June Garcia as the Class Representative;

14 5. Appoint Jean-Claude Lapuyade, Esq. of the JCL Law Firm, APC, and Shani O. Zakay,
15 Esq. of Zakay Law Group, APLC, as Class Counsel; and

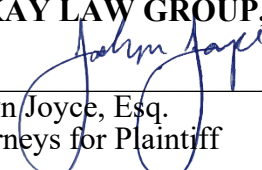
16 6. Set a hearing date for final approval of the settlement.

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

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

27 Dated: January 27, 2025

ZAKAY LAW GROUP, APLC

28 By: 
Jaclyn Joyce, Esq.
Attorneys for Plaintiff