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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

Action Filed: June 13, 2023

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

Date: July 25, 2025

Time: 10:30 a.m.

Judge: Hon. Loren G. Freestone

Department: C-64

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on July 25, 2025, or as soon
3 thereafter as the matter can be heard, in Department C-64 of the above-entitled Court, before the
4 Honorable Judge Loren G. Freestone, Plaintiff JUNE GARCIA ("Plaintiff") will apply for an order
5 granting (1) Final Approval of the Class Action and PAGA Settlement, (2) Class Counsel Award
6 and Enhancement Award, and (3) Entry of the Final Approval Order and Judgment.

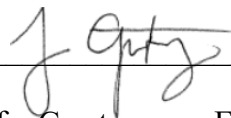
7 This Motion is brought in accordance with the Preliminary Approval Order dated March 18,
8 2025, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action
10 Claims and Release of Claims (hereinafter the "Agreement"), the Declaration of Shani O. Zakay,
11 the Declaration of Jean-Claude Lapuyade, the Declaration of the Plaintiff, the Declaration of the
12 Settlement Administrator, and the complete files and records in this action.

13 Because all parties have agreed to the proposed class settlement and have met and conferred
14 regarding the motion, this motion is not opposed by Defendants. To date, there have been no
15 objections submitted by the Class.

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

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19 Dated: July 1, 2025

Respectfully submitted,
ZAKAY LAW GROUP, APLC

20 By: 
21 Jennifer Gerstenzang, Esq.

22 Attorney for Plaintiff
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