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JCL LAW FIRM, APC

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Attorneys for Plaintiff DEANNA RICKETTS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SISKIYOU

DEANNA RICKETTS, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiff,

v.

MOUNTAIN SILVERADO, INC., a
California Corporation; DENNIS R
ERICKSON, an individual; and DOES 1
through 50, Inclusive,

Defendants.

Case No. 22CV00796

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

Date: September 26, 2024
Time: 9:30 AM

Judge: Hon. Karen L. Dixon
Dept.: 2

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

2 PLEASE TAKE NOTICE that as soon as counsel may be heard, in Department 2 of the Siskiyou
3 Superior Court, the Honorable Judge Karen L. Dixon presiding, plaintiff Deanna Ricketts will, and
4 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 A to the
7 Declaration of Jean-Claude Lapuyade, Esq., filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

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

11 4. Appoint Plaintiff DEANNA RICKETTS as the Class Representative;

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

13 7. 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 Settlement; (3) the
16 Declaration of Jean-Claude Lapuyade, Esq.; (5) the Declaration of Deanna Ricketts; (6) the
17 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit
18 attached thereto; (7) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement
19 and exhibits attached thereto; (8) the records, pleadings, and papers filed in this action; and (9) upon
20 such other documentary and oral evidence or argument as may be presented to the Court at or prior to
21 the hearing of this Motion.

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

24 Dated: August 19, 2024

JCL LAW FIRM, APC

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