

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
Julieann Alvarado (State Bar #334727)
Rachel Newman (State Bar #350826)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619)255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com
julieann@zakaylaw.com
rachel@zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com

Attorneys for Plaintiff ALEJANDRO ESTRADA URENO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

ALEJANDRO ESTRADA URENO, an
individual, on behalf of himself, and on behalf
of all persons similarly situated,

Plaintiff,

v.

DWWH, INC. dba WEIR CANYON
HONDA, a California corporation; DWWA,
INC. dba WEIR CANYON ACURA, a
California corporation, formerly identified as
DOE 1, and DOES 2-50, Inclusive,

Defendants.

Case No.: 30-2023-01316346-CU-OE-CXC

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION TO APPROVE PAGA
SETTLEMENT**

Hearing Date: October 18, 2024

Hearing Time: 9:00 AM

Judge: Hon. William D. Cluster
Dept.: CX101

Reservation ID: 74355182

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 am on October 18, 2024, or as soon
3 thereafter as the matter can be heard, in Department CX101 of the above-entitled Court, Plaintiff
4 Alejandro Estrada Ureno ("Plaintiff"), pursuant to labor Code section 2699(s)(2), will apply for an
5 Order Approving the parties' PAGA Settlement, filed concurrently herewith. Defendants have
6 advised that they do not oppose Plaintiff's Motion.

7 This unopposed Motion will be made on the grounds that the proposed PAGA Settlement is
8 fair, adequate, reasonable, and in the best interests of the State of California and the aggrieved
9 employees. This Motion will be based on this notice, the accompanying points and authorities, the
10 Declarations of Shani O. Zakay, Esq. and Jean-Claude Lapuyade, Esq., the Parties' PAGA
11 Settlement Agreement, and the complete files and records in this action.

12 Plaintiff respectfully requests that, pursuant to the specific terms (including timing and
13 manner) as set forth in the executed Stipulation of Settlement of PAGA Claims and Release of
14 PAGA Claims (the "Settlement Agreement") and assuming conditions are met therein, the Court (1)
15 grant approval of the Parties' PAGA Settlement; (2) appoint Apex Class Action LLC as the Claims
16 Administrator; (3) direct that the agreed-upon Notice of PAGA Settlement be approved and sent to
17 the allegedly aggrieved employees with their settlement share checks in the manner set forth in the
18 Settlement Agreement; (4) award PAGA Counsel their fees' and litigation costs; and (5) award
19 Plaintiff his Service Award. Plaintiff also requests that the Court sign and enter the proposed PAGA
20 Settlement Approval Order, filed concurrently herewith.

21
22 Dated: August 6, 2024

ZAKAY LAW GROUP, APLC
JCL LAW FIRM, APC

23
24 By:



25 _____
Shani O. Zakay, Esq.
Jean-Claude Lapuyade, Esq.
26 Attorneys for Plaintiff and the Aggrieved Employees
27
28