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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

EDRALIN LEGASPI, an individual, on behalf
of himself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

AAA T.L.C. HEALTH CARE, INC., a
California Corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 23STCV03126

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

Date: March 3, 2026

Time: 9:00am

Judge: Hon. William F. Highberger

Dept. 10

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

2 PLEASE TAKE NOTICE that on March 3, 2026, at 9:00am or as soon thereafter as counsel
3 may be heard, in Department 10 of the Los Angeles Superior Court, the Honorable Judge William F.
4 Highberger presiding, Plaintiff Edralin Legaspi will, and hereby, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action and PAGA
6 Settlement Agreement, (hereinafter "Settlement Agreement") attached as Exhibit 1 to the Declaration
7 of Jean-Claude Lapuyade, Esq., filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Class Action Settlement and Hearing
10 Date for Final Court Approval, to the Settlement Class;

11 4. Appoint Plaintiff Edralin Legaspi as the Class Representative;

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

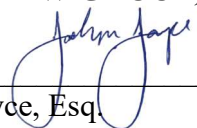
13 6. Set a hearing date for final approval of the settlement.

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.; (3) the Declaration of Shani O. Zakay, Esq.; (4) the
17 Declaration of Plaintiff Edralin Legaspi; (5) the Declaration of Kimberly Sutherland (Settlement
18 Administrator); (6) the Settlement Agreement and exhibit attached thereto; (7) the [Proposed] Order
19 Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto;
20 (8) the records, pleadings, and papers filed in this action; and (9) upon such other documentary and
21 oral evidence or argument as may be presented to the Court at or prior to 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
25 Dated: November 6, 2025

ZAKAY LAW GROUP, APLC

26 By: 
27 Jaclyn Joyce, Esq.
28 Attorneys for Plaintiff