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Attorneys for Plaintiff TATIANA BOVE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

TATIANA BOVE, an individual, on behalf of
herself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

S&B RESTAURANT GROUP LLC dba
CHICK-FIL-A, a California limited liability
company; and DOES 1-50, Inclusive,

Defendants.

Case No. 23STCV02528

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

Date: July 26, 2024

Time: 10:30 a.m.

Judge: Hon. Stuart M. Rice

Dept.: 1

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

2 PLEASE TAKE NOTICE that on July 26, 2024, at 10:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 1 of the Los Angeles Superior Court, the Honorable Judge Stuart M.
4 Rice presiding, plaintiff TATIANA BOVE will, and hereby does, move this Court to:

- 5 1. Preliminarily approve the settlement described in the Class Action and PAGA
6 Settlement Agreement (“Agreement”) attached as Exhibit 1 to the Declaration of Perssia Razma, Esq.
7 filed concurrently herewith;
- 8 2. Conditionally certify the Settlement Class;
- 9 3. Approve distribution of the proposed Class Notice;
- 10 4. Appoint Plaintiff TATIANA BOVE as the Class Representative;
- 11 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; and
- 12 7. Set a hearing date for final approval of the settlement.

13 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
14 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
15 the Declaration of Perssia Razma, Esq., (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the
16 Declaration of Shani O. Zakay, Esq.; (6) the Declaration of Tatiana Bove; (7) the Declaration of the
17 Administrator; (8) the Declaration of Kenneth L. Creal, CPA; (9) the Class Action and PAGA
18 Settlement Agreement and exhibit attached thereto; (10) the [Proposed] Order Granting Preliminary
19 Approval of Class Action and PAGA Settlement and exhibits attached thereto; (11) the records,
20 pleadings, and papers filed in this action; and (12) upon such other documentary and oral evidence or
21 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 Dated: July 2, 2024

JCL LAW FIRM, APC

25 By: Perssia Razma
26 Perssia Razma, Esq.
27 Attorneys for Plaintiff
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