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Attorneys for PLAINTIFFS

(Additional counsel listed on next page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

GIOVANNI CISNEROS and MANUEL
VARGAS, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiff,

v.

SAVAGE INFRASTRUCTURE LLC
(formerly known as SAVAGE SERVICES
CORPORATION), a Utah corporation; and
DOES 1-50, Inclusive,

Defendants.

Case No: STK-CV-UOE-2023-2575

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

Date: July 22, 2026

Time: 9:00 a.m.

Judge: Hon. John Soldati

Dept.: 10D

1 **MAKAREM & ASSOCIATES**
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9 Attorneys for Plaintiffs
10 GIOVANNI CISNEROS and MANUEL VARGAS
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1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on July 22, 2026, or as soon thereafter
3 as the matter can be heard, in Department 10D of the above-entitled Court, before the Honorable
4 John Soldati, Plaintiffs GIOVANNI CISNEROS and MANUEL VARGAS will apply for an order
5 granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final
6 Approval Order and Judgment.

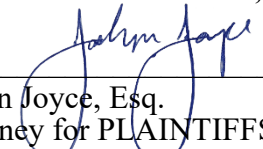
7 This Motion is brought in accordance with the Preliminary Approval Order dated December
8 19, 2025, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action
10 Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay,
11 Esq., the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Samuel D. Almon, Esq.,
12 the Declaration of Plaintiff Giovanni Cisneros, the Declaration of Plaintiff Manuel Vargas, the
13 Declaration of the Claims Administrator, and the complete files and records in this action.

14 Because all parties have agreed to the proposed Class and PAGA settlement and have met
15 and conferred regarding the motion, this motion is not opposed by Defendant. As this Motion is
16 unopposed, the Parties respectfully request relief from the page limit requirement set by California
17 Rules of Court, Rule 3.1113(d). To date, there have been no objections submitted by the Class.

18 Respectfully submitted,

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20 Dated: June 26, 2026

ZAKAY LAW GROUP, APLC

21 By: 
22 Jaclyn Joyce, Esq.
23 Attorney for PLAINTIFFS
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