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Attorneys for Plaintiffs

GIOVANNI CISNEROS and MANUEL VARGAS

(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,

Plaintiffs,

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 FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT**

Date:

Time:

Judge:

Hon. Barbara Kronlund

Dept.:

10D

MAKAREM & ASSOCIATES

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Attorneys for Plaintiffs

GIOVANNI CISNEROS and MANUEL VARGAS

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

2 YOU ARE HEREBY NOTIFIED THAT at _____ a.m. on
3 _____, or as soon thereafter as the matter can be heard, in Department 10D
4 of the San Joaquin County Superior Court, the Honorable Judge Barbara Kronlund presiding, Plaintiffs
5 Giovanni Cisneros and Manuel Vargas will, and hereby do, move this Court to:

6 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
7 and PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit 1 to the
8 Declaration of Jean-Claude Lapuyade filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement to
11 the Settlement Class;

12 4. Appoint Plaintiffs Giovanni Cisneros and Manuel Vargas as the Class Representatives;

13 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Makarem and
14 Associates as Class Counsel; and

15 7. Set a hearing date for final approval of the settlement.

16 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
17 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
18 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
19 Declaration of Samuel . Almon, Esq.; (6) the Declaration of the Claims Administrator; (7) the
20 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit
21 attached thereto; (8) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA
22 Settlement and exhibit attached thereto; (9) the records, pleadings, and papers filed in this action; and
23 (10) upon such other documentary and oral evidence or argument as may be presented to the Court at
24 or prior to the hearing of this Motion.

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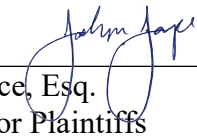
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1 As this Motion is unopposed, the Parties respectfully request relief from the page limit
2 requirement set by California Rules of Court, Rule 3.1113(d).

3
4 Dated: September 23, 2025

ZAKAY LAW GROUP, APLC

5 By: 
6 Jaclyn Joyce, Esq.
7 Attorney for Plaintiffs