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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

JESUS GARCIA, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

THE BEACH CHALET, L.P., a California
Limited Partnership; and DOES 1-50,
Inclusive,

Defendants.

Case No. CGC-22-600090

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

Date: October 23, 2025

Time: 9:00am

Dept.: 302

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

2 PLEASE TAKE NOTICE that on October 23, 2025, at 9:00 a.m. or as soon thereafter as counsel
3 may be heard, in Department 302 of the San Francisco Superior Court, Plaintiff Jesus Garcia will, and
4 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 Shani O. Zakay
7 concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Class Action Settlement to the
10 Settlement Class attached as Exhibit A to the Agreement;

11 4. Appoint Plaintiff Jesus Garcia 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.; (4) the Declaration of Jesus Garcia; (5) the Declaration
17 of Shani O. Zakay, Esq.; (6) the Class Action and PAGA Settlement Agreement and exhibit attached
18 thereto; (7) Declaration Of Kenneth Creal In Support Of Motion For Preliminary Approval Of Class
19 Action And Paga Settlement; (8) Declaration of Bryn Bridley re Qualifications of Atticus
20 Administration; (9) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA
21 Settlement and exhibits attached thereto; (9) the records, pleadings, and papers filed in this action; and
22 (10) upon such other documentary and oral evidence or argument as may be presented to the Court at
23 or prior to the hearing of this Motion.

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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).

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4 Dated: September 25, 2025

ZAKAY LAW GROUP, APLC

5 By: 
6 Jackland K. Hom, Esq.
7 Attorneys for Plaintiff
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