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Attorneys for Plaintiff OSCAR ALMANZA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

OSCAR ALMANZA, an individual, on behalf
of himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

HOPE OF THE VALLEY RESCUE MISSION,
a California Nonprofit Corporation; and DOES
1-50, Inclusive,

Defendants.

Case No.: 22STCV17591

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

Hearing Date: April 5, 2024

Hearing Time: 10:30 a.m.

Judge: Hon. Stuart M. Rice

Dept: 1

1 **TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:**

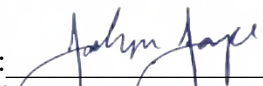
2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on April 5, 2024 or as soon thereafter
3 as the matter can be heard, in Department 1 of the above entitled Court, before the Honorable Judge
4 Stuart M. Rice, Plaintiff OSCAR ALMANZA (“Plaintiff”) will apply for an order (1) preliminary
5 approving the proposed settlement of this class and PAGA action with Defendant HOPE OF THE
6 VALLEY RESCUE MISSION (“Defendant”); (2) approving the form and method for providing
7 class-wide notice; (3) directing that notice of the proposed settlement be given to the class; and (4)
8 scheduling a final approval hearing date to consider Plaintiff’s motion for final approval of the
9 settlement and entry of the Judgment, and Plaintiff’s motion for approval of attorneys’ fees and
10 litigation expenses.

11 This motion for preliminary approval of the class settlement is brought pursuant to
12 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of motion and
13 motion, the accompanying points and authorities, the Declaration of Shani O. Zakay, the
14 Declaration of Jean-Claude Lapuyade, the Declaration of Oscar Almanza, the Declaration of Sean
15 Hartranft, the Class Action and PAGA Settlement Agreement and Class Notice (“Agreement”)
16 between the parties, and the complete files and records in this action. All parties have agreed to the
17 proposed class settlement and have met and conferred regarding the motion; therefore, this motion
18 is not opposed by Defendant.

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20 DATED: March 11, 2024

Respectfully submitted,

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22 **ZAKAY LAW GROUP, APLC**

23 By: 
24 Jaclyn Joyce, Esq.
25 Attorney for Plaintiff
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