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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

DANIEL KENNEDY, an individual, in his
representative capacity, on behalf of the State
of California and fellow Aggrieved
Employees,

Plaintiff,

v.

HCL AMERICA SOLUTIONS INC., a
California corporation; HCL AMERICA
INC., a California corporation; and DOES 1-
50, Inclusive,

Defendants.

Case No.: CGC-22-603642

**NOTICE OF MOTION TO APPROVE
PAGA SETTLEMENT**

Date: March 5, 2026

Time: 10:00 a.m.

Dept.: 613

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on March 5, 2026, or as soon thereafter
3 as the matter can be heard, in Department 613 of the above-entitled Court, Plaintiff Daniel Kennedy
4 (hereinafter, "Plaintiff"), pursuant to labor Code section 2699(s)(2), will apply for an Order Approving
5 the Parties' Settlement Agreement and Release of PAGA Claim (the "Agreement"), filed concurrently
6 herewith. Defendant has advised that it does not oppose Plaintiff's Motion.

7 This unopposed Motion will be made on the grounds that the proposed PAGA Settlement is fair,
8 adequate, reasonable, and in the best interests of the State of California and the Aggrieved Employees.
9 This Motion will be based on this notice, the accompanying points and authorities, the Declarations
10 of Jean-Claude Lapuyade, Esq., Shani O. Zakay, Esq., the Claims Administrator, the Agreement, and
11 the complete files and records in this action.

12 Plaintiff respectfully requests that, pursuant to the specific terms (including timing and manner)
13 as set forth in the Agreement and assuming conditions are met therein, the Court (1) grant approval of
14 the Agreement; (2) appoint Apex Class Action LLC as the Claims Administrator; (3) direct that the
15 agreed-upon Notice of Settlement be approved and sent to the Aggrieved Employees with their
16 settlement share checks in the manner set forth in the Agreement; and (4) award PAGA Counsel their
17 fees' and litigation costs. Plaintiff also requests that the Court sign and enter the proposed Order
18 Approving PAGA Settlement and Judgment, filed concurrently herewith.

19
20 Dated: January 30, 2026

ZAKAY LAW GROUP, APLC

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22 By: _____

Jaclyn Joyce, Esq.
23 Attorneys for PLAINTIFF
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