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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

ISAIAH D. HUGHES, an individual, on behalf
of himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

ASIAN AND PACIFIC ISLANDER
WELLNESS CENTER, INC. (dba SAN
FRANCISCO COMMUNITY HEALTH
CENTER), a California corporation; and DOES
1-50, Inclusive,

Defendants.

Case No. CGC-22-599270

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

Date: March 4, 2024
Time: 9:30 a.m.
Dept.: 302

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on March 4, 2024, or as soon
3 thereafter as the matter can be heard, in Department 302 of the above-entitled Court, before the
4 Honorable Judge Richard B. Ulmer, Jr., Plaintiff ISIAH D. HUGHES (“Plaintiff”) will apply for
5 an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of
6 the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated November
8 2, 2023, 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 the Declaration of Jean-Claude Lapuyade, the Declaration of the Plaintiff, and the complete files
12 and records in this action.

13 Because all parties have agreed to the proposed class settlement and have met and conferred
14 regarding the motion, this motion is not opposed by Defendant. To date, there have been no
15 objections submitted by the Class.

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17 Respectfully submitted,

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20 Dated: February 6, 2024

JCL LAW FIRM, APC

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By: 
Jean-Claude Lapuyade, Esq.

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Attorney for Plaintiff

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