

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Monnett De La Torre (State Bar #272884)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com
mdelatorre@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Julieann Alvarado (State Bar #334727)
5440 Morehouse Drive, Suite 3500
San Diego, CA 92121
Telephone: (619)255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
julieann@zakaylaw.com

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 PRELIMINARY
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: November 2, 2023
Time: 9:30 a.m.

Judge: Hon. Anne-Christine Massullo
Dept.: 610

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

2 PLEASE TAKE NOTICE that on **November 2, 2023, at 9:30 a.m.**, or as soon thereafter as
3 counsel may be heard, in Department 610 of the San Francisco Superior Court, the Honorable Judge
4 Anne-Christine Massullo presiding, plaintiff Isaiah D. Hughes will, and hereby does, move this Court
5 to:

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

9 2. Conditionally certify the Settlement Class;

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

12 4. Appoint Plaintiff Isiah D. Hughes as the Class Representative;

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

14 6. Set a hearing date for final approval of the settlement.

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

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

25
26 Dated: October 5, 2023

JCL LAW FIRM, APC

27 By: _____
28 Jean-Claude Lapuyade
Attorneys for Plaintiff