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Attorneys for Plaintiff JONATHAN CHEUNG

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

JONATHAN CHEUNG, an individual, on
behalf of himself and on behalf of all persons
similarly situated,

Plaintiff,

v.

SIGNATURE COMMERCIAL SOLUTIONS,
LLC, a Florida limited liability company; and
DOES 1-50, Inclusive,

Defendants.

Case No. 22STCV13034

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

Date: July 31, 2023

Time: 8:30 a.m.

Judge: Hon. Holly J. Fujie

Dept.: 56

Reservation ID.: 000742504080

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

2 PLEASE TAKE NOTICE that on July 31, 2023, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 56 of the Los Angeles Superior Court, the Honorable Judge Holly J.
4 Fujie presiding, plaintiff Jonathan Cheung will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action and PAGA
6 Settlement Agreement and Class Notice ("Agreement") attached as Exhibit A to the Declaration of
7 Jean-Claude Lapuyade filed 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;

11 4. Appoint Plaintiff JONATHAN CHEUNG as the Class Representative;

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

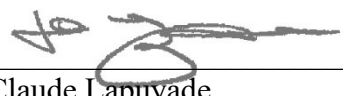
13 7. Set a hearing date for final approval of the settlement.

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 Shani O. Zakay, Esq.; (5) the
17 Declaration of Lisa Mullins; (6) the Declaration of Jonathan Cheung; (7) the Class Action and PAGA
18 Settlement Agreement and exhibit attached thereto; (8) the [Proposed] Order Granting Preliminary
19 Approval of Class Action and PAGA Settlement and exhibits attached thereto; (9) the records,
20 pleadings, and papers filed in this action; and (10) upon such other documentary and oral evidence or
21 argument as may be presented to the Court at or prior to the hearing of this Motion.

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

24
25 Dated: July 6, 2023

JCL LAW FIRM, APC

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



Court Reservation Receipt

Reservation

Reservation ID: 000742504080	Status: RESERVED
Reservation Type: Motion re: (Preliminary Approval of Class Action and PAGA Settlement)	Number of Motions: 1
Case Number: 22STCV13034	Case Title: JONATHAN CHEUNG vs SIGNATURE COMMERCIAL SOLUTIONS, LLC
Filing Party: Jonathan Cheung (Plaintiff)	Location: Stanley Mosk Courthouse - Department 56
Date/Time: July 31st 2023, 8:30AM	Confirmation Code: CR-TNLQXOKRYYF4CRQ8F

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	60.00	1	60.00
Credit Card Percentage Fee (2.75%)	1.65	1	1.65
TOTAL			\$61.65

Payment

Amount: \$61.65	Type: Visa
Account Number: XXXX9291	Authorization: 01673G
Payment Date: 2023-05-13	

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