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Attorneys for Plaintiff JESSE GALINDO

(Additional counsel listed on next page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

JESSE GALINDO and LAURA SMITH, on
behalf of themselves, and on behalf of all
persons similarly situated,

Plaintiff,

v.

PAQ, INC., DBA FOOD 4 LESS and/or
RANCHO SAN MIGUEL MARKETS; and
DOES 1 through 50, Inclusive;

Defendants.

Lead Case No. STK-CV-UOE-2022-0000452
[Consolidated Case No. STK-CV-UOE-2022-
0001799]

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

Date: September 17, 2024

Time: 9:00 a.m.

Judge: Hon. Blanca A. Banuelos

Dept.: 10B

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Attorneys for Plaintiff, LAURA SMITH,
7 on behalf of herself and all others similarly situated
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1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on September 17, 2024, or as soon
3 thereafter as the matter can be heard, in Department 10B of the above-entitled Court, before the
4 Honorable Judge Blanca A. Banuelos, Plaintiffs JESSE GALINDO and LAURA SMITH will apply
5 for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry
6 of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated May 14,
8 2024, 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 Esq., the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of James R. Hawkins, Esq.,
12 the Declaration of Plaintiff Jesse Galindo, the Declaration of Plaintiff Laura Smith, the Declaration
13 of the Settlement Administrator (Madely Nava), and the complete files and records in this action.

14 Because all parties have agreed to the proposed Class and PAGA settlement and have met
15 and conferred regarding the motion, this motion is not opposed by Defendant. As this Motion is
16 unopposed, the Parties respectfully request relief from the page limit requirement set by California
17 Rules of Court, Rule 3.1113(d). To date, there have been no objections submitted by the Class.

18 Respectfully submitted,

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20 Dated: August 22, 2024

JCL LAW FIRM, APC

21 By: 
22 Monnett De La Torre, Esq.
23 Attorneys for Plaintiff
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