

**ZAKAY LAW GROUP, APLC**

Shani O. Zakay (State Bar #277924)  
Jackland K. Hom (State Bar #327243)  
Julieann Alvarado (State Bar #334727)  
5440 Morehouse Drive, Suite 3600  
San Diego, CA 92121  
Telephone: (619) 255-9047  
Facsimile: (858) 404-9203  
[shani@zakaylaw.com](mailto:shani@zakaylaw.com)  
[jackland@zakaylaw.com](mailto:jackland@zakaylaw.com)  
[julieann@zakaylaw.com](mailto:julieann@zakaylaw.com)

**JCL LAW FIRM, APC**

Jean-Claude Lapuyade (State Bar #248676)  
5440 Morehouse Drive, Suite 3600  
San Diego, CA 92121  
Telephone: (619) 599-8292  
Facsimile: (619) 599-8291  
[jlapuyade@jcl-lawfirm.com](mailto:jlapuyade@jcl-lawfirm.com)

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF ALAMEDA**

BRIA WARE, an individual, on behalf of  
herself and on behalf of all persons similarly  
situated,

Plaintiff,

v.

SHAKE SHACK ENTERPRISES LLC, a  
New York Limited Liability Company; and  
DOES 1-50, Inclusive.

Defendants.

Case No. 21CV002063

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

Date: October 17, 2023

Time: 3:00 p.m.

Judge: Hon. Brad Seligman

Dept.: 23

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

2           YOU ARE HEREBY NOTIFIED THAT at 3:00 p.m. on October 17, 2023, or as soon  
3 thereafter as the matter can be heard, in Department 23 of the above-entitled Court, before the  
4 Honorable Judge Brad Seligman, Plaintiff BRIA WARE (“Plaintiff”) will apply for an order will  
5 apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2)  
6 Entry of the Final Approval Order and Judgment.

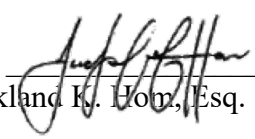
7           This Motion is brought in accordance with the Preliminary Approval Order dated May 26,  
8 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the  
9 accompanying points and authorities, the Stipulation of Settlement of Class Action Claims and  
10 Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, the  
11 Declaration of Jean-Claude Lapuyade, the Declaration of Makenna Snow, (the Settlement  
12 Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

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

16  
17           Respectfully submitted,

18  
19           Dated: September 21, 2023

**ZAKAY LAW GROUP, APLC**

20  
21           By: \_\_\_\_\_  
22           Jackland K. Hom, Esq.

23           Attorney for Plaintiff  
24  
25  
26  
27  
28