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Attorneys for Plaintiff PEDRO RODRIGUEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

PEDRO RODRIGUEZ on behalf of himself
and on behalf of all persons similarly situated;

Plaintiff,

v.

R.M. PARKS, INC. (erroneously sued as R.M.
Parks Place, Inc.), a California corporation; and
DOES 1-50, Inclusive,

Defendants.

Case No. STK-CV-UOE-2021-6050

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

Date:

Time: 9:00 a.m.

Judge: Hon. Erin Guy Castillo

Dept.: 10B

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

2 PLEASE TAKE NOTICE that on _____, at 9:00 a.m., or as soon thereafter
3 as counsel may be heard, in Department 6 of the Los Angeles Superior Court, the Honorable Judge
4 Erin Guy Castillo presiding, plaintiff PEDRO RODRIGUEZ will, and hereby does, move this Court
5 to:

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

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement to
11 the Settlement Class;

12 4. Appoint Plaintiff PEDRO RODRIGUEZ as the Class Representative;

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

14 7. 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 Pedro Rodriguez; (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.

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

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4 Dated: January 5, 2023

JCL LAW FIRM, APC

5 By: 
6 Jean-Claude Lapuyade
7 Attorneys for Plaintiff
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