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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CRUZ

CRISTAL RODRIGUEZ, on behalf of herself
and on behalf of all persons similarly situated,

Plaintiff,

vs.

EAH INC. a California Corporation; and DOES
1-50, Inclusive,

Defendants.

Case No. 21CV00884

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

Date: March 28, 2023

Time: 8:30 a.m.

Department: 10

Trial Date: N/A

Action Filed: April 5, 2021

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

2 PLEASE TAKE NOTICE that on March 28, 2023, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 10 of the Santa Cruz Superior Court, the Honorable Marjorie Carter
4 presiding, plaintiff CRISTAL RODRIGUEZ ("Plaintiff") will, and hereby does, move this Court to:

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

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Class Action and PAGA Settlement to
10 the Settlement Class;

11 4. Appoint Plaintiff CRISTAL RODRIGUEZ as the Class Representative;

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

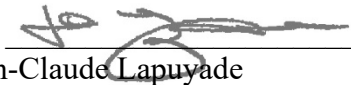
13 7. Set a hearing date for final approval of the settlement.

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 Cristal Rodriguez; (7) the Stipulation of Settlement of Class and PAGA Action Claims
18 and Release of Claims 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: March 3, 2023

JCL LAW FIRM, APC

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