

JCL LAW FIRM, APC

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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

JAMES E. AGUILAR, an individual;
PAMELA CAZARES, an individual, on behalf
of themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

T & K, L.P., a California Limited Partnership;
and DOES 1-50, Inclusive.

Defendants

Case No. 21CV384674

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

Hearing Date: October 26, 2023

Hearing Time: 1:30 p.m.

Department: 1

Trial Date: None

Action Filed: July 23, 2021

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

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on October 26, 2023, or as soon
3 thereafter as the matter can be heard, in Department 1 of the above-entitled Court, before the
4 Honorable Judge Sunil R. Kulkarni, Plaintiffs JAMES E. AGUILAR and PAMELA CAZARES
5 (“Plaintiffs”) will apply for an order will apply for an order granting (1) Final Approval of the
6 Class Action and PAGA Settlement, and (2) Entry of the Final Approval Order and Judgment.

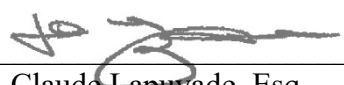
7 This Motion is brought in accordance with the Preliminary Approval Order dated May 30,
8 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Joint Stipulation and Agreement for Class and
10 Representative Action Settlement and Release (“Agreement”), the Declaration of Shani O. Zakay,
11 the Declaration of Jean-Claude Lapuyade, the Declaration of Makenna Snow (the Settlement
12 Administrator), the Declarations of the Plaintiffs, 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 Respectfully submitted,

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18 Dated: October 3, 2023

JCL LAW FIRM, APC

19 By: 
20 Jean-Claude Lapuyade, Esq.
21 Attorneys for Plaintiffs
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