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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF CONTRA COSTA**

JOSE SANTILLAN and JESUS NAVARRO,  
individuals, on behalf of themselves, and on  
behalf of all persons similarly situated,

Plaintiffs,

v.

NUMBER ONE CONCRETE READY MIX,  
INC., a California corporation; A CUT ABOVE  
SERVICES, INC., a California corporation;  
and DOES 1-50, Inclusive,

Defendants.

Case No. C25-00726

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

Date:

Time:

Judge: Hon. Benjamin T. Reyes, II  
Dept.: 16

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

2 PLEASE TAKE NOTICE that on \_\_\_\_\_, at \_\_\_\_ a.m./p.m., or as soon thereafter  
3 as counsel may be heard in Department 16 of the Contra Costa Superior Court, the Honorable  
4 Benjamin T. Reyes, II presiding, Plaintiffs JOSE SANTILLAN and JESUS NAVARRO will, and  
5 hereby does, move this Court 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 1 to the  
8 Declaration of Sydney Castillo-Johnson filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

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

12 4. Appoint Plaintiffs JOSE SANTILLAN and JESUS NAVARRO as the Class  
13 Representatives;

14 5. Appoint the Jean-Claude Lapuyade, Esq. and Sydney Castillo-Johnson, Esq. of JCL  
15 Law Firm, APC, and Shani O. Zakay, Esq. of Zakay Law Group, APLC as Class Counsel; and

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

17 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and  
18 Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement; (3)  
19 the Declaration of Sydney Castillo-Johnson, Esq.; (4) the Declaration of Jean-Claude Lapuyade, Esq.;  
20 (5) the Declaration of Shani O. Zakay, Esq.; (6) the Declarations of Plaintiffs; (7) the declaration of  
21 the Settlement Administrator; (8) the Stipulation of Settlement of Class and PAGA Action Claims and  
22 Release of Claims and exhibit attached thereto; (9) the [Proposed] Order Granting Preliminary  
23 Approval of Class and PAGA Action Settlement and exhibits attached thereto; (10) the records,  
24 pleadings, and papers filed in this action; and (11) upon such other documentary and oral evidence or  
25 argument as may be presented to the Court at 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: May 8, 2026

**JCL LAW FIRM, APC**

5       By: Sydney Castillo-Johnson  
6       Sydney Castillo-Johnson, Esq.  
7       Attorneys for Plaintiffs  
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