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Attorneys for Plaintiff FIDEL GOMEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TULARE

TATYANA WILSON, an individual, on behalf
of herself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

SIERRA MINIT MARTS, INC., a California
corporation; DON FORRESTER, an
individual; and DOES 2-50, Inclusive,

Defendants.

Case No. VCU308861

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

Date: March 2, 2026

Time: 8:30 a.m.

Judge: Hon. Gary Johnson

Dept.: 7

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

2 PLEASE TAKE NOTICE that on March 2, 2026, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 7 of the Tulare County Superior Court, the Honorable Gary Johnson
4 presiding, plaintiff Tatyana Wilson will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
6 and PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit 1 to the Shani O.
7 Zakay, Esq. filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class and Representative
10 Action Settlement and Final Hearing Date ;

11 4. Appoint Plaintiff Tatyana Wilson as the Class Representative;

12 5. Appoint the Jean-Claude Lapuyade of the JCL Law Firm, APC and Shani Zakay of the
13 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 Tatyana Wilson; (6) the Declaration of the Settlement Administrator; (7) the Class
19 Action and PAGA Settlement Agreement and exhibit attached thereto; (8) the [Proposed] Order
20 Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto;
21 (9) the records, pleadings, and papers filed in this action; and (10) upon such other documentary and
22 oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

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

25 Dated: February 2, 2026

ZAKAY LAW GROUP, APLC

26 By: 
27 Jaclyn Joyce, Esq.
28 Attorneys for Plaintiff