

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
Perssia Razma (State Bar #351398)
John L. Nitti (State Bar #330752)
Carolina Faccin (State Bar #340855)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
prazma@jcl-lawfirm.com
jnitti@jcl-lawfirm.com
cfaccin@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K Hom (State Bar #327243)
Jaclyn Joyce (State Bar #285124)
3110 Camino Del Rio S, Suite 308
San Diego, CA 92108
Telephone: (619) 255-9047
shani@zakaylaw.com
jackland@zakaylaw.com
jaclyn@zakaylaw.com

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

JUAN JIMENEZ-PADILLA, an individual; on
behalf of Plaintiffs, and on behalf of all persons
similarly situated,

Plaintiff,

v.

SANDAIR CORPORATION d.b.a.
CALIFORNIA FREIGHT SALES, a California
corporation; SUPERIOR TRUCK LINES,
INC., a California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. STK-CV-UOE-2025-0009283

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

Judge: Hon. Esmeralda Zendejas
Dept.: 11A

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

2 YOU ARE HEREBY NOTIFIED THAT as soon as the matter can be heard, in Department 11A
3 of the San Joaquin County Superior Court, the Honorable Judge Esmeralda Zendejas presiding,
4 Plaintiff Juan Jimenez-Padilla 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
7 Declaration of Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

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

11 4. Appoint Plaintiffs Juan Jimenez-Padilla as the Class Representative;

12 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, 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 Juan Jimenez-Padilla.; (6) the Declaration of the Claims Administrator; (7) the
18 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit
19 attached thereto; (8) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA
20 Settlement and exhibit attached thereto; (9) the records, pleadings, and papers filed in this action; and
21 (10) 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.

23
24
25
26
27
28 ///

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).

3
4 Dated: September 4, 2026

JCL LAW FIRM, APC

5 By: Sydney Castillo-Johnson
6 Sydney Castillo-Johnson, Esq.
7 Attorney for Plaintiff
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28