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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

TANYA MARSHALL and MARIA
ANDRADE, individually, and on behalf of
other members of the general public similarly
situated,

Plaintiff,

v.

WATTS HEALTHCARE CORPORATION, a
California Corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 19STCV27737

Related Case No. 20STCV08186

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

Date: February 26, 2025

Time: 10:30 a.m.

Judge: Hon. Stuart M. Rice

Dept.: 1

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

2 PLEASE TAKE NOTICE that on February 26, 2025, at 10:30 a.m., or as soon thereafter as
3 counsel may be heard, in Department 1 of the Los Angeles Superior Court, the Honorable Judge Stuart
4 M. Rice presiding, plaintiffs TANYA MARSHALL and MARIA ANDRADE will, and hereby do,
5 move this Court to:

6 1. Preliminarily approve the settlement described in the Class Action and PAGA
7 Settlement Agreement (“Agreement”) attached as Exhibit 1 to the Declaration of Joanna Ghosh, Esq.
8 filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Class Notice;

11 4. Appoint Plaintiffs TANYA MARSHALL and MARIA ANDRADE as the Class
12 Representatives;

13 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Lawyers *for* Justice,
14 P.C. as Class Counsel; and

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

16 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
17 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
18 the Declaration of Joanna Ghosh, Esq., (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the
19 Declaration of Shani O. Zakay, Esq.; (6) the Declaration of Tanya Marshall; (7) the Declaration of
20 Maria Andrade; (8) the Declaration of the Administrator; (9) the Class Action and PAGA Settlement
21 Agreement and exhibit attached thereto; (10) the [Proposed] Order Granting Preliminary Approval of
22 Class Action and PAGA Settlement and exhibits attached thereto; (11) the records, pleadings, and
23 papers filed in this action; and (12) upon such other documentary and oral evidence or argument as
24 may be presented to the Court at or prior to the hearing of this Motion.

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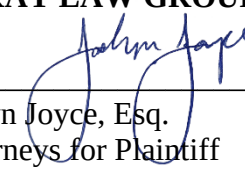
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1 As this Motion is unopposed, the Parties respectfully request relief from the page limit
2 requirement set by California Rules of Court, Rule 3.1113(d).

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4 Dated: January 30, 2025

ZAKAY LAW GROUP, APLC

5 By: 
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Jaclyn Joyce, Esq.

Attorneys for Plaintiff
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