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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

DYLAN SIERRA, an individual, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

CENTURY RESTAURANT LLC, a California
limited liability company; and DOES 1-50,
Inclusive,

Defendant.

Case No. 24STCV12748

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

Date: March 5, 2026

Time: 10:30 a.m.

Judge: Hon. Carolyn B. Kuhl

Dept.: 12

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

2 PLEASE TAKE NOTICE that as soon as counsel may be heard, in Department 12 of the Los
3 Angeles Superior Court, the Honorable Carolyn B. Kuhl presiding, plaintiff DYLAN SIERRA will,
4 and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action And PAGA
6 Settlement Agreement and Class Notice (“Agreement”) attached as Exhibit 1 to the Declaration of
7 Sydney Castillo-Johnson, 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 DYLAN SIERRA as the Class Representative;

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

14 6. Set a hearing date for Plaintiff’s Motion for Final Approval; and

15 7. Set a hearing date for Plaintiff’s Motion for Attorneys’ Fees and Litigation Costs and
16 Class Representative Payment.

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 Action and PAGA Settlement; (3)
19 the Class Action and PAGA Settlement Agreement and Class Notice and exhibit attached thereto; (4)
20 the Declaration of Sydney Castillo-Johnson, Esq.; (5) the Declaration of Jean-Claude Lapuyade, Esq.;
21 (6) the Declaration of Shani Zakay, Esq.; (7) Declaration of Sydney Castillo-Johnson, Esq; (8) the
22 Declaration of Dylan Sierra; (9) the Declaration of the Settlement Administrator; (10) the [Proposed]
23 Order Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits attached
24 thereto; (11) the records, pleadings, and papers filed in this action; and (12) upon such other
25 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
26 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).

3 Dated: December 23, 2025

JCL LAW FIRM, APC

4 By: Carolina Faccin

5 Carolina Faccin, Esq.

6 Attorneys for PLAINTIFF
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