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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF RIVERSIDE

RAUL SERRANO, an individual, on behalf of
himself, and on behalf of all persons similarly
situated;

Plaintiff,

v.

DELUXE AUTO CARRIERS, INC. a
California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. CVRI2402625

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

Date: August 20, 2025
Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp
Dept.: 1

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

2 PLEASE TAKE NOTICE that on August 20, 2025, at 8:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department 1 of the Riverside Superior Court, the Honorable Judge Harold W. Hopp
4 presiding, Plaintiff RAUL SERRANO 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 Claims and Release of Claims (“Agreement”) attached as Exhibit A to the Declaration of
7 Sydney Castillo-Johnson filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement,
10 Exclusion Form, Objection Form, and Final Hearing Date to the Settlement Class;

11 4. Appoint Plaintiff Raul Serrano as the Class Representative;

12 5. Appoint the JCL Law Firm, APC, and Zakay Law Group, APLC, as Class Counsel;

13 6. Set a hearing date for final approval of the settlement;

14 7. This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points
15 and Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement;
16 (3) the Declaration of Sydney Castillo-Johnson, Esq.; (4) the Declaration of Jean-Claude Lapuyade,
17 Esq.; (5) the Declaration of Shani O. Zakay, Esq.; (6) the Declaration of the Plaintiff; (7) the
18 Declaration of the Settlement Administrator; (8) Agreement and exhibit attached thereto; (9) the
19 [Proposed] Order Granting Preliminary Approval of Class and PAGA Action Settlement and exhibits
20 attached thereto; (9) the records, pleadings, and papers filed in this action; and (10) upon such other
21 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
22 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: July 24, 2025

JCL LAW FIRM, APC

26 By: Sydney Castillo-Johnson
27 Sydney Castillo-Johnson
28 Attorneys for PLAINTIFF