

JCL LAW FIRM, APC

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Attorneys for Plaintiff JAMAL GAMBLE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JAMAL GAMBLE, an individual, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiff,

vs.

AIRX UTILITY SURVEYORS, INC., a
California corporation; and DOES 1 through
100, Inclusive.

Defendants.

Case No. 37-2022-00042178-CU-OE-CTL

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

Date: July 19, 2024

Time: 10:30 a.m.

Judge: Hon. Carolyn M. Caietti

Department: C-70

Action Filed: October 20, 2022

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

2 PLEASE TAKE NOTICE that on July 19, 2024, at 10:30 a.m., or as soon thereafter as counsel
3 may be heard, in Department C-70 of the San Diego Superior Court, the Honorable Carolyn M. Caietti
4 presiding, plaintiff JAMAL GAMBLE (“Plaintiff”) will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in Stipulation of Settlement of Class and
6 PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the Declaration
7 of Jean-Claude Lapuyade, Esq. 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 and Final Hearing Date to the Settlement Class;

11 4. Appoint Plaintiff JAMAL GAMBLE as the Class Representative;

12 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, and Lawyers for Justice,
13 P.C. 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 forthcoming Declaration of Joanna Ghosh, Esq.; (6) the Declaration of Jamal Gamble; (7) the
19 Declaration of the Settlement Administrator; (8) the Declaration of Kenneth L. Creal, CPA; (9) the
20 fully executed Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims
21 and exhibit attached thereto; (10) the [Proposed] Order Granting Preliminary Approval of Class Action
22 and PAGA Settlement and exhibits attached thereto; (11) the records, pleadings, and papers filed in
23 this action; and (12) upon such other documentary and oral evidence or argument as may be presented
24 to the Court at or prior to the hearing 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: June 25, 2024

JCL LAW FIRM, APC

4 By: Perssia Razma
5 Perssia Razma, Esq.

6 Attorneys for Plaintiff
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