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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LAN HO, an individual, on behalf of herself,
and on behalf of all persons similarly situated,

Plaintiff,

v.

MHF MV MANAGER VI LLC a Delaware
limited liability company; MHF MV
OPERATING VI LLC dba COURTYARD
SAN DIEGO MISSION VALLEY /HOTEL
CIRCLE, a Delaware limited liability company;
MHF MV VI LLC, a Delaware limited liability
company; and DOES 1-50, Inclusive,

Defendant.

Case No: 37-2024-00023005-CU-OE-CTL

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

Date: February 27, 2026
Time: 9:00 a.m.

Judge: Hon. Euketa Oliver
Dept.: C-75

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

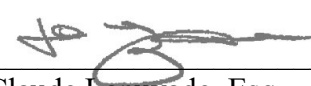
2 PLEASE TAKE NOTICE that on February 27, 2026, at 9:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department C-75 of the San Diego Superior Court, the Honorable Judge
4 Euketa Oliver presiding, Plaintiffs Lan Ho ("Plaintiff Ho") and Marlene Benitez ("Plaintiff Benitez")
5 (collectively, "Plaintiffs") will, and hereby do, move this Court to:

- 6 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
7 and PAGA Action Claims and Release of Claims ("Agreement") attached as Exhibit 1 to the
8 Declaration of Jean-Claude Lapuyade, Esq., filed concurrently herewith;
- 9 2. Conditionally certify the Settlement Class;
- 10 3. Approve distribution of the proposed Notice of Pendency of Class and Representative
11 Action Settlement and Final Hearing Date ("Class Notice") attached as Exhibit A to the Agreement;
- 12 4. Appoint Plaintiffs Lan Ho and Marlene Benitez as the Class Representatives;
- 13 5. Appoint Jean-Claude Lapuyade, Esq. of JCL Law Firm, APC, Shani O. Zakay, Esq. of
14 Zakay Law Group, APLC, Thomas D. Rutledge, Esq. of Law Office of Thomas D. Rutledge, and Joel
15 Larabee, Esq. of Larabee Law Firm as Class Counsel; and
- 16 6. Set a hearing date for final approval of the settlement.

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 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit
20 attached thereto; (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the Declaration of Shani O.
21 Zakay, Esq.; (6) the Declaration of Thomas D. Rutledge, Esq.; (7) the Declaration of Joel Larabee,
22 Esq.; (8) the Declaration of Lan Ho; (9) the Declaration of the Settlement Administrator; (10) the
23 [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits
24 attached 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.

27 Dated: January 30, 2026

JCL LAW FIRM, APC

28 By: 
Jean-Claude Lapuyade, Esq.
Attorneys for Plaintiffs