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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

NATASHA TAYLOR, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

v.

THE WEST OAKLAND HEALTH
COUNCIL, a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No: RG20049604

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

Date: February 25, 2025

Time: 1:30 p.m.

Reservation ID: 803492234138

Judge: Hon. Somnath Raj Chatterjee

Dept.: 21

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

2 PLEASE TAKE NOTICE that on February 25, 2025, at 1:30 p.m., or as soon thereafter as
3 counsel may be heard, in Department 21 of the Alameda Superior Court, the Honorable Judge Somnath
4 Raj Chatterjee, plaintiff NATASHA TAYLOR, 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 Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the
7 Declaration of Jean-Claude Lapuyade, Esq. filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve the distribution of the proposed Notice of Settlement of Class and
10 Representative Action to the Settlement Class;

11 4. Appoint Plaintiff NATASHA TAYLOR, as the Class Representative;

12 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC, and Lawyers for
13 Justice, 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 Declaration of Ryan Slinger, Esq.; (6) the Declaration of Natasha Taylor; (7) the Declaration of the
19 Settlement Administrator; (8) the Agreement and exhibit attached thereto; (9) the [Proposed] Order
20 Granting Preliminary Approval of Class Action and PAGA Settlement and exhibits attached thereto;
21 (10) the records, pleadings, and papers filed in this action; and (11) upon such other documentary and
22 oral evidence or argument as may be presented to the Court at or prior to the hearing 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: January 29, 2025

JCL LAW FIRM, APC

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



Superior Court of Alameda County Public Portal

Court Reservation Receipt

Reservation

Reservation ID: 803492234138	Status: RESERVED
Reservation Type: Motion re: (Motion for Preliminary Approval of Class Action and PAGA Settlement)	Number of Motions: 1
Case Number: RG20049604	Case Title: Taylor VS The West Oakland Health Council
Filing Party: Natasha Taylor (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 21
Date/Time: February 25th 2025, 1:30PM	Confirmation Code: CR-I5K5CXZ2T2VCMN4NV

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	.00	1	.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: Visa
Account Number: XXXX9291	Authorization: 04021G
Payment Date: 2024-10-25	

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