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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LOUIS CARABETTA, an individual, on behalf
of himself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

MITCHELL REPAIR INFORMATION
COMPANY, LLC, a Delaware limited liability
company; SNAP-ON INCORPORATED, a
Delaware corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 37-2024-00020244-CU-OE-CTL

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

Date: January 23, 2026
Time: 1:30 p.m.

Judge: Hon. Katherine Bacal
Dept.: C-63

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 C-63 of the San
3 Diego Superior Court, the Honorable Judge Katherine Bacal presiding, Plaintiff Louis Carabetta will,
4 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 1 to the
7 Declaration 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 and Representative
10 Action Settlement and Final Hearing Date;

11 4. Appoint Plaintiff Louis Carabetta as the Class Representative;

12 5. Appoint Jean-Claude Lapuyade, Esq. of JCL Law Firm, APC and Shani O. Zakay of
13 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 Class Counsel Award and Service Award.

16 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
17 Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement; (3)
18 the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit
19 attached thereto; (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the Declaration of Shani
20 Zakay, Esq.; (5) the Declaration of Louis Carabetta; (6) the Declaration of the Settlement
21 Administrator; (7) the [Proposed] Order Granting Preliminary Approval of Class and PAGA Action
22 Settlement and exhibits attached thereto; (8) the records, pleadings, and papers filed in this action; and
23 (9) upon such other documentary and oral evidence or argument as may be presented to the Court at
24 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: December 23, 2025

JCL LAW FIRM, APC

4 By: Perssia Razma
5 Perssia Razma, Esq.
6 Attorneys for PLAINTIFF
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