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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

ALSHA JACKSON, an individual,
FRANCISCO CARRILLO GONZALEZ, an
individual, on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

v.

AC PRO INC., a California corporation; and
DOES 1-50, Inclusive,

Defendants

Case No: CIVSB2407673

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

Date: November 6, 2025

Time: 8:30 a.m.

Judge: Hon. Jeffrey R. Erickson
Dept.: S14

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 S14 of the San
3 Bernardino Superior Court, the Honorable Judge Jeffrey R. Erickson presiding, plaintiffs Alsha
4 Jackson and Francisco Carrillo Gonzalez will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action and PAGA
6 Settlement Agreement and Release (“Agreement”) attached as **Exhibit 1** to the Declaration of Sydney
7 Castillo-Johnson, 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 Plaintiffs Alsha Jackson and Francisco Carillo Gonzalez as the Class
12 Representatives;

13 5. Appoint the Jean-Claude Lapuyade, Esq. of JCL Law Firm, APC, Shani O. Zakay, Esq.
14 of Zakay Law Group, APLC, and Scott Ernest Wheeler of The Wheeler Law Firm, APC, as Class
15 Counsel;

16 6. Set a hearing date for Plaintiff’s Motion for Final Approval; and

17 7. Set a hearing date for Plaintiff’s Motion for Class Counsel Award and Service Award.

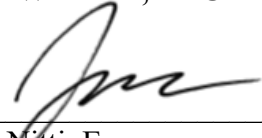
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1 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
2 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the Class
3 Action and PAGA Settlement Agreement and Release exhibit attached thereto; (4) the Declaration of
4 Sydney Castillo-Johnson, Esq.; (5) the Declaration of Jean-Claude Lapuyade, Esq.; (6) the Declaration
5 of Shani Zakay, Esq.; (7) the Declaration of Alsha Jackson; (8) the Declaration of Francisco Carrillo
6 Gonzalez (9) the Declaration of Scott Ernest Wheeler (10) the Declaration of the Settlement
7 Administrator; (11) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement
8 and exhibits attached thereto; (12) the records, pleadings, and papers filed in this action; and (13) upon
9 such other documentary and oral evidence or argument as may be presented to the Court at or prior to
10 the hearing of this Motion.

11 As this Motion is unopposed, the Parties respectfully request relief from the page limit
12 requirement set by California Rules of Court, Rule 3.1113(d).

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14 Dated: October 10, 2025

JCL LAW FIRM, APC

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16 By: 
17 John L. Mitti, Esq.
18 Attorney for PLAINTIFFS
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