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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF CONTRA COSTA

JOSE RAMON DE LA CRUZ, an individual,
on behalf of himself, and on behalf of all
persons similarly situated,

Plaintiff,

v.

GALPAO GAUCHO TWO, LLC, a Texas
limited liability company; GALPAO
GAUCHO THREE, LLC, a California limited
liability company; GALPAO GAUCHO
FOUR LLC, a California limited liability
company; GALPAO GAUCHO FIVE LLC, a
California limited liability company;
GALPAO GAUCHO EIGHT LLC, a
California limited liability company;
GALPAO GAUCHO NINE LLC, a California
limited liability company; and DOES 1-50,
Inclusive,

Defendants.

Case No. C23-01770

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

Date: June 26, 2025
Time: 9:00 a.m.

Judge: Hon. Edward G. Weil
Dept.: 39

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

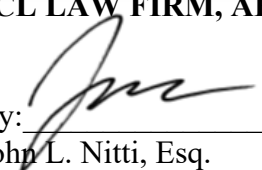
2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on June 26, 2025, or as soon
3 thereafter as the matter can be heard, in Department 39 of the above-entitled Court, before the
4 Honorable Judge Edward G. Weil, Plaintiff JOSE RAMON DE LA CRUZ ("Plaintiff") will apply
5 for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry
6 of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Third Amended Preliminary Approval
8 Order dated April 11, 2025, and California Rules of Court, rule 3.769. This Motion will be based
9 on this notice, the accompanying points and authorities, the Stipulation of Settlement of Class and
10 PAGA Action Claims and Release of Claims (hereinafter, "Agreement"), the Declaration of Jean-
11 Claude Lapuyade, Esq., the Declaration of Shani O. Zakay, Esq., the Declaration of Madely Nava
12 (the Administrator), the Declaration of the Plaintiff, and the complete files and records in this
13 action.

14 Because all parties have agreed to the proposed class settlement and have met and
15 conferred regarding the motion, this motion is not opposed by Defendants. To date, there have
16 been no objections submitted by the Class.

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18 Dated: June 2, 2025

Respectfully submitted,
JCL LAW FIRM, APC

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20 By: 
John L. Nitti, Esq.
Attorneys for PLAINTIFF
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