

ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff DINO DE SANCTIS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF CONTRA COSTA

DINO DE SANCTIS, an individual, on behalf
of himself, and on behalf of all persons
similarly situated,

Plaintiff,

vs.

HENKEL US OPERATIONS
CORPORATION, a Delaware corporation;
HENKEL OF AMERICA, INC., a Delaware
corporation; HENKEL CORPORATION, a
Delaware corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. C23-02468

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

Date:

Time:

Judge: Hon. Charles S. Treat

Dept.: 12

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

2 PLEASE TAKE NOTICE that on _____, at ____ a.m./p.m., or as soon thereafter
3 as counsel may be heard in Department 12 of the Contra Costa Superior Court, the Honorable Judge
4 Charles S. Treat presiding, Plaintiff DINO DE SANCTIS will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Joint Stipulation of Class and
6 Representative Action Settlement (“Agreement”) attached as Exhibit 1 to the Declaration of Jean-
7 Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

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

11 4. Appoint Plaintiff DINO DE SANCTIS as the Class Representative;

12 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; and

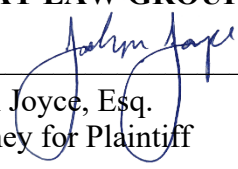
13 7. Set a hearing date for final approval of the settlement.

14 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points
15 and Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement;
16 (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5)
17 the Declaration of Plaintiff; (6) the Declaration of the Parties’ Claims Administrator; (7) the Joint
18 Stipulation of Class and Representative Action Settlement and exhibit attached thereto; (8) the
19 [Proposed] Order Granting Preliminary Approval of Class and PAGA Action Settlement and exhibits
20 attached thereto; (9) the records, pleadings, and papers filed in this action; and (10) upon such other
21 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
22 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: October 18, 2024

ZAKAY LAW GROUP, APLC

26 By: 
27 Jaclyn Joyce, Esq.
28 Attorney for Plaintiff