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Attorneys for Plaintiff Juan Manuel Parra Chavez,
individually, and on behalf of all other similarly situated employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

JUAN MANUEL PARRA CHAVEZ, as an
individual and on behalf of other similarly
situated employees,

Plaintiff,

vs.

HILTON RESORTS CORPORATION, a
California corporation, HILTON
RESERVATIONS WORLDWIDE, LLC, a
California corporation, HILTON HOTEL
EMPLOYER LLC, a California corporation,
and HILTON MANAGEMENT, LLC, a
California corporation, and DOES 1-50,
inclusive,

Defendant

Case No.: 30-2022-01248249-CU-OE-CXC

Assigned for all purposes to: Hon. David A.
Hoffer

**NOTICE OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: August 29, 2025

Hearing Time: 10:00 a.m.

Department: CX103

Reservation ID: 74578939

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

3 **PLEASE TAKE NOTICE** that on August 29, 2025 at 10:00 a.m., or as soon thereafter as
4 counsel may be heard, in Department Cx105 of the above-captioned court, located at 751 W. Santa Ana
5 Blvd., Santa Ana, California 92701, the Honorable David A. Hoffer, presiding, Plaintiff Juan Manuel
6 Parra Chavez will, and hereby does, move this Court to:

- 7 1. Preliminarily approve the settlement described in the Stipulation of Class Action
8 Settlement (attached as **Exhibit A** to the Declaration of Armond M. Jackson), which contains the
9 principal terms of the class action settlement between Plaintiff Juan Manuel Parra Chavez and Defendants
10 Hilton Resorts Corporation, Hilton Reservations Worldwide, LLC, Hilton Hotel Employer, LLC and
11 Hilton Management, LLC. (collectively referred to as “Parties”);
- 12 2. Conditionally certify the proposed Settlement Class;
- 13 3. Approve distribution of the proposed Notice of Class Action and Exclusion Form;
- 14 4. Appoint Plaintiff Juan Manuel Parra Chavez as the class representative;
- 15 5. Appoint Jackson APC as class counsel;
- 16 6. Appoint ILYM Group, Inc. as the settlement administrator; and
- 17 7. Set a hearing date for final approval of the settlement.

18 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
19 Points and Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the
20 Declaration of Armond M. Jackson; (4) the Declaration of Juan Manuel Parra Chavez; (5) the Notice of
21 Class Action Settlement; (6) the [Proposed] Order Granting Preliminary Approval of the Stipulation of
22 Class Action Settlement; (7) the records, pleadings, and papers filed in this action; and (8) such other
23 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of
24 this Motion.

1 Dated: June 4, 2025

2 By: /s/ Armond M. Jackson

3 Armond M. Jackson, Esq.
4 Andrea M. Fernandez-Jackson, Esq.

5 **JACKSON APC**

6 Attorneys for Plaintiff Juan Manuel Parra Chavez and
7 all other similarly situated employees
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ACTION SETTLEMENT**