

JCL LAW FIRM, APC

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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

TAMIKA R. THOMAS, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

CENTER FOR ELDERS' INDEPENDENCE,
a California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No: 22CV024221

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

Date: December 29, 2023

Time: 9:00 a.m.

Reservation ID: 628376307502

Judge: Hon. Evelio Grillo

Dept.: 21

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

2 PLEASE TAKE NOTICE that on December 29, 2023, at 9:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 21 of the Alameda Superior Court, the Honorable Judge Evelio
4 Grillo presiding, plaintiff TAMIKA R. THOMAS will, 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 A to the
7 Declaration of Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

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

11 4. Appoint Plaintiff TAMIKA R. THOMAS 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; (2) the Memorandum of Points and
15 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
16 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
17 Declaration of Tamika R. Thomas; (6) the Declaration of the Settlement Administrator; (7) Agreement
18 and exhibit attached thereto; (8) the [Proposed] Order Granting Preliminary Approval of Class Action
19 and PAGA Settlement and exhibits attached thereto; (9) the records, pleadings, and papers filed in this
20 action; and (10) upon such other documentary and oral evidence or argument as may be presented to
21 the Court at or prior to the hearing of this Motion.

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

24 Dated: December 5, 2023

JCL LAW FIRM, APC

25 By: Sydney Castillo-Johnson
26 Sydney Castillo-Johnson, Esq.
27 Attorneys for Plaintiff
28



Court Reservation Receipt

Reservation

Reservation ID: 628376307502	Status: RESERVED
Reservation Type: Motion (Preliminary Approval of Class Action and PAGA Settlement)	Number of Motions: 1
Case Number: 22CV024221	Case Title: THOMAS vs CENTER FOR ELDER'S INDEPENDENCE
Filing Party: Tamika Thomas (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 21
Date/Time: December 29th 2023, 9:00AM	Confirmation Code: CR-SEPPFBD6HE5IJQQ8C

Fees

Description	Fee	Qty	Amount
Motion (name extension)	.00	1	.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: Visa
Account Number: XXXX9291	Authorization: 01366G
Payment Date: 2023-10-06	

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