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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN LUIS OBISPO

ELISA ALVAREZ, an individual, on behalf of
herself, and on behalf of all persons similarly
situated,

Plaintiffs,

vs.

SLO ARCHES, INC., a California Corporation;
IVERNIA, INCORPORATED, a California
Corporation; GOLDEN SENECA, INC., a
California Corporation; and DOES 1 through
50, Inclusive;

Defendants.

Case No. 21CV-0533

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

Date:

Time:

Judge:

Hon. Craig van Rooyen

Dept.:

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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 2 of the San
3 Luis Obispo Superior Court, the Honorable Judge Craig van Rooyen presiding, Plaintiff ELISA
4 ALVAREZ will, and hereby does, move this Court to:

- 5 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
6 Action Claims and Release of Claims (“Agreement”) attached as Exhibit A 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 Pendency of Class Action Settlement and
10 Final Hearing Date to the Settlement Class;
- 11 4. Appoint Plaintiff Elisa Alvarez as the Class Representative;
- 12 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APC as Class Counsel; and
- 13 7. Set a hearing date for final approval of the settlement.

14 This Motion is based upon: (1) this Amended Notice of 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 Elisa Alvarez; (6) the Declarations of the Settlement Administrator; (7) the
18 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit
19 attached thereto; (8) the [Proposed] Order Granting Preliminary Approval of Class and PAGA Action
20 Settlement and exhibits attached thereto; (9) the records, pleadings, and papers filed in this action; and
21 (10) upon such other documentary and oral evidence or argument as may be presented to the Court at
22 or prior to the hearing 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: April 1, 2024

JCL LAW FIRM, APC

26 By: 
27 Jean-Claude Lapuyade
28 Attorneys for Plaintiff