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Attorneys for Plaintiff ELISA ALVAREZ

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

Date: July 13, 2023

Time: 9:00 a.m.

Judge: Hon. Rita Coyne Federman

Dept.: 2

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

2 PLEASE TAKE NOTICE that on July 13, 2023, at 9:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department 2 of the San Luis Obispo Superior Court, the Honorable Judge Rita
4 Coyne Federman presiding, Plaintiff ELISA 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
10 and 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

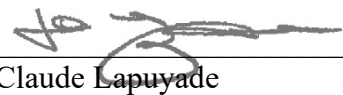
13 7. Set a hearing date for final approval of the settlement.

14 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
15 Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement; (3)
16 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
17 Declaration of Elisa Alvarez; (6) the Stipulation of Settlement of Class and PAGA Action Claims and
18 Release of Claims and exhibit attached thereto; (7) the [Proposed] Order Granting Preliminary
19 Approval of Class and PAGA Action Settlement and exhibits attached thereto; (8) the records,
20 pleadings, and papers filed in this action; and (9) upon such other documentary and oral evidence or
21 argument as may be presented to 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: June 20, 2023

JCL LAW FIRM, APC

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