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Attorneys for Plaintiff Cesar Cando

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

CESAR CANDO, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

ACADEMY VALET PARKING SERVICE,
INC., a California Corporation; and DOES 1-
50, Inclusive,

Defendants.

Case No. 22STCV21833

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

Date: January 10, 2024

Time: 9:00 a.m.

Judge: Hon. Maren E. Nelson

Dept.: 17

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

2 PLEASE TAKE NOTICE that on January 10, 2024, at 9:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department 17 of the Los Angeles Superior Court, the Honorable Judge Maren E.
4 Nelson presiding, plaintiff CESAR CANDO will, and hereby does, move this Court to:

5 1. Preliminarily approve the settlement described in the Class Action and PAGA
6 Settlement Agreement (“Agreement”) attached as Exhibit 1 to the Declaration of Jean-Claude
7 Lapuyade, Esq. 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 CESAR CANDO as the Class Representative;

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

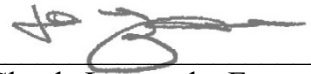
13 7. Set a hearing date for final approval of the settlement.

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 Cesar Cando; (6) the Declaration of the Administrator; (7) the Declaration of Kenneth
18 L. Creal, CPA; (8) the Class Action and PAGA Settlement Agreement and exhibit attached thereto;
19 (9) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement and
20 exhibits attached thereto; (10) the records, pleadings, and papers filed in this action; and (11) upon
21 such other documentary and oral evidence or argument as may be presented to the Court at or prior to
22 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: September 28, 2023

JCL LAW FIRM, APC

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