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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

THOMAS E. WEATHERMON III, an
individual, on behalf of himself, and on behalf
of all persons similarly situated,

Plaintiff,

v.

PACIFIC PRODUCTION PLUMBING, INC.,
a California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 37-2023-00006167-CU-OE-CTL

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

Date: October 24, 2025

Time: 8:30 a.m.

Judge: Hon. Blaine Bowman

Dept.: C-74

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 C-74 of the San
3 Diego Superior Court, the Honorable Judge Blaine Bowman presiding, plaintiff Thomas E.
4 Weathermon III 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 1 to the
7 Declaration of Sydney Castillo-Johnson, Esq., filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class and Representative
10 Action Settlement and Final Hearing Date;

11 4. Appoint Plaintiff THOMAS E. WEATHERMON III as the Class Representative;

12 5. Appoint the Sydney Castillo-Johnson, Esq. and Jean-Claude Lapuyade, Esq. of JCL
13 Law Firm, APC and Shani O. Zakay, Esq. of Zakay Law Group, APLC as Class Counsel;

14 6. Set a hearing date for Plaintiff’s Motion for Final Approval; and

15 7. Set a hearing date for Plaintiff’s Motion for Class Counsel Award and Service Award.

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1 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
2 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the
3 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit
4 attached thereto; (4) the Declaration of Sydney Castillo-Johnson, Esq.; (5) the Declaration of Jean-
5 Claude Lapuyade, Esq.; (6) the Declaration of Shani Zakay, Esq.; (7) the Declaration of Thomas E.
6 Weathermon III; (8) the Declaration of the Settlement Administrator; (9) the [Proposed] Order
7 Granting Preliminary Approval of Class Action Settlement and exhibits attached thereto; (10) the
8 records, pleadings, and papers filed in this action; and (11) upon such other documentary and oral
9 evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

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

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13 Dated: September 29, 2025

JCL LAW FIRM, APC

14 By: Sydney Castillo-Johnson
15 Sydney Castillo-Johnson, Esq.
16 Attorneys for PLAINTIFF
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