

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
Perssia Razma (State Bar #351398)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
prazma@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
shani@zakaylaw.com

Attorneys for PLAINTIFF JACQUELINE NAYYAR

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SOLANO

JACQUELINE NAYYAR, an individual,
AMANDA MEDRANO, an individual, on
behalf of themselves, other Aggrieved
Employees, and the State of California,

Plaintiffs,

vs.

PIZZA INVESTMENT ENTREPRENEURS,
L.L.C., a Nevada Limited Liability Company;
and DOES 1-50, Inclusive;

Defendants.

Case No: FCS056804

**NOTICE OF MOTION AND MOTION TO
APPROVE PAGA SETTLEMENT**

Date: January 10, 2025
Time: 9:00 a.m.

Judge: Hon. Stephen Gizzi
Dept: 3

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

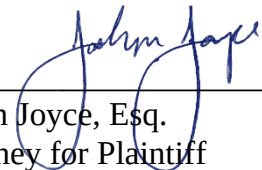
2 YOU ARE HEREBY NOTIFIED THAT on January 10, 2025, at 9:00 a.m. or as soon as this
3 matter may be heard in Courtroom A of the above-entitled Court before the Honorable Judge Stephen
4 Gizzi, Plaintiff Jacqueline Nayyar (“Plaintiff”) will apply for an order approving the California Labor
5 Code Private Attorneys General Act (“PAGA”) settlement in accordance with Labor Code §2699(l).
6 The proposed settlement is set forth in the accompanying PAGA Settlement Agreement (the
7 “Settlement Agreement”).

8 This motion will be based on this notice of motion and motion, the accompanying points and
9 authorities, the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq.,
10 the forthcoming Declaration of the Plaintiff, the Declaration of the Settlement Administrator, the
11 Declaration of Michael Sheehan, the Settlement Agreement between the parties, and the complete
12 files and records in this action. All parties have approved the Settlement Agreement and have met
13 and conferred regarding the motion; therefore, this motion is not opposed by Defendant. The Labor
14 Workforce Development Agency has been served with this motion and the Settlement Agreement as
15 set forth in the accompanying Declaration of Jean-Claude Lapuyade. As this Motion is unopposed,
16 the Parties respectfully request relief from the page limit requirement set by California Rules of Court,
17 Rule 3.1113(d).

18 Notice: The Superior Court in and for Solano County has adopted a tentative rulings system
19 that is described in the court’s local Rule 3.9. Failure to comply with Rule 3.9 may seriously affect
20 parties’ rights in this case.

21 DATED: September 6, 2024

ZAKAY LAW GROUP, APLC

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23 By: 
24 Jaclyn Joyce, Esq.
25 Attorney for Plaintiff
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