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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF STANISLAUS

EDWARD GRAY and JESSICA MUTO,
individuals, on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

v.

SKY HOTELS, INC., a California corporation;
MODCO 2, LLC, a California limited liability
company; and DOES 1-50, Inclusive,

Defendants.

Case No. CV-22-004004

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

Date: December 16, 2025

Time: 8:30 a.m.

Judge: Hon. John D. Freeland

Department: 23

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 23 of the
3 Stanislaus Superior Court, the Honorable John D. Freeland presiding, plaintiffs EDWARD GRAY,
4 JESSICA MUTO, TAMMY LALLIER, JONATHAN HARRISON-LIAM OLSON II, and KEILY
5 VILLEDA (“Plaintiffs”) will, and hereby do, move this Court to:

6 1. Preliminarily approve the settlement described in Stipulation of Settlement of Class and
7 PAGA Action Claims and Release of Claims (“Agreement”) attached as Exhibit A to the Declaration
8 of Jean-Claude Lapuyade, Esq. filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

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

12 4. Appoint Plaintiffs Edward Gray, Jessica Muto, Tammy Lallier, Jonathan Harrison-Liam
13 Olson II, and Keily Villeda as the Class Representatives;

14 5. Appoint the JCL Law Firm, APC, Zakay Law Group, APLC, Bibiyan Law Group, PC,
15 and Messrelian Law as Class Counsel; and

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

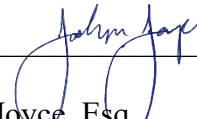
17 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
18 Authorities in Support of Motion for Preliminary Approval of Class and PAGA Action Settlement; (3)
19 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
20 Declaration of David D. Bibiyan, Esq.; (6) the declaration of Harout Messrelian; (7) the Declaration
21 of Edward Gray; (8) the Declaration of Jessica Muto; (9) the Declaration of Tammy Lallier; (10) the
22 Declaration of Jonathan Harrison-Liam Olson II; (11) the Declaration of Keily Villeda; (12) the
23 Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims and exhibit
24 attached thereto; (13) the [Proposed] Order Granting Preliminary Approval of Class and PAGA Action
25 Settlement and exhibits attached thereto; (14) the records, pleadings, and papers filed in this action;
26 and (15) upon such other documentary and oral evidence or argument as may be presented to the Court
27 at or prior to the hearing of this Motion.

28 As this Motion is unopposed, the Parties respectfully request relief from the page limit

1 requirement set by California Rules of Court, Rule 3.1113(d).

2 Dated: October 2, 2025

ZAKAY LAW GROUP, APLC

3 By:  _____

4 Jaclyn Joyce, Esq.

5 Attorneys for Plaintiffs
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