

ZAKAY LAW GROUP, APLC
Shani O. Zakay (State Bar #277924)
shani@zakaylaw.com
Eden Zakay (State Bar #339536)
eden@zakaylaw.com
Nicole Noursamadi (State Bar #357246)
nicole@zakaylaw.com
Jaclyn Joyce (State Bar #285124)
jaclyn@zakaylaw.com
3110 Camino Del Rio S, Suite 308
San Diego, CA 92108
Telephone: (619) 255-9047

JCL LAW FIRM, APC
Jean-Claude Lapuyade (State Bar #248676)
jlapuyade@jcl-lawfirm.com
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292

Attorneys for PLAINTIFFS

(Additional Counsel Listed on Next Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF STANISLAUS

EDWARD GRAY; JESSICA MUTO; KEILY
VILLEDA; TAMMY LALLIER; and
JONATHAN HARRISON-LIAM OLSON II,
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; J. R.P. HOSPITALITY, INC., a
California corporation; CY3 LLC, a California
limited liability company; NIMESH PATEL,
an individual; SUREKHA PATEL, an
individual; and MAHESH PATEL, an
individual; and DOES 1-50, Inclusive,

Defendants.

Case No.: CV-22-004004

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

Date: August 14, 2026
Time: 08:30 a.m.

Judge: Hon. Clifford Tong
Dept.: 23

1 **MESSRELIAN LAW INC.**
Harout Messrelian, Esq.
2 hm@messrelianlaw.com
101 N. Brand Blvd., Suite 1450
3 Glendale, California 91203
Telephone: (818) 484-6531
4
BIBIYAN LAW GROUP, P.C.
5 Vedang Patel, Esq.
vedang@tomorrowlaw.com
6 1460 Westwood Boulevard
Los Angeles, California 90024
7 Telephone: (310) 438-5555
Facsimile: (310) 300-1705
8
Attorneys for PLAINTIFFS
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

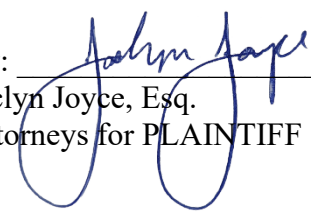
2 YOU ARE HEREBY NOTIFIED THAT at 08:30 a.m. on May 1, 2026, or as soon thereafter
3 as the matter can be heard, in Department 23 of the above-entitled Court, before the Honorable
4 Judge Clifford Tong, Plaintiffs EDWARD GRAY, JESSICA MUTO, KEILY VILLEDA, TAMMY
5 LALLIER, and JONATHAN HARRISON-LIAM OLSON II (“Plaintiffs”) will apply for an order
6 granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final
7 Approval Order and Judgment.

8 This Motion is brought in accordance with the Preliminary Approval Order dated January
9 22, 2026, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Stipulation of Class and PAGA Action Claims and Release
11 of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, Esq., the Declaration
12 of Jean-Claude Lapuyade, Esq., the Declaration of David Bibiyan, Esq., the Declaration of Harout
13 Messrelian, Esq., the Declaration of the Settlement Administrator, the Declaration of Plaintiff
14 Edward Gray, the Declaration of Plaintiff Jessica Muto, the Declaration of Plaintiff Keily Villeda,
15 the Declaration of Plaintiff Tammy Lallier, and the Declaration of Plaintiff Jonathan Harrison-Liam
16 Olson II, and the complete files and records in this action.

17 Because all parties have agreed to the proposed class settlement and have met and conferred
18 regarding the motion, this motion is not opposed by Defendants. To date, there have been no
19 objections submitted by the Class.

20
21 Dated: July 20, 2026

ZAKAY LAW GROUP, APLC

22
23 By: 
24 Jaclyn Joyce, Esq.
25 Attorneys for PLAINTIFF
26
27
28