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Attorneys for Plaintiff ALAN CARRILLO RODRIGUEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SAN JOAQUIN**

ALAN CARRILLO RODRIGUEZ, an  
individual, on behalf of himself and on behalf  
of all persons similarly situated,

Plaintiff,

v.

TITAN WORKFORCE, a California  
Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. STK-CV-UOE-2022-0003036

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

Date: October 23, 2023

Time: 8:45 a.m.

Judge: Hon. Barbara Kronlund

Dept.: 10D

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

2 PLEASE TAKE NOTICE that on October 23, 2023, at 8:45 a.m., or as soon thereafter as counsel  
3 may be heard, in Department 10D of the San Joaquin Superior Court, the Honorable Judge Barbara  
4 Kronlund presiding, Plaintiff Alan Carrillo Rodriguez 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 Jean-Claude Lapuyade filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement to  
10 the Settlement Class;

11 4. Appoint Plaintiff Alan Carrillo Rodriguez 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 Alan Carrillo Rodriguez; (6) the Class Action and PAGA Settlement Agreement and  
18 exhibit attached thereto; (7) the [Proposed] Order Granting Preliminary Approval of Class Action and  
19 PAGA Settlement and exhibits attached thereto; (8) the records, pleadings, and papers filed in this  
20 action; and (9) upon such other documentary and oral evidence or argument as may be presented to the  
21 Court at or prior to the hearing of this Motion.

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

24  
25 Dated: September 18, 2023

**JCL LAW FIRM, APC**

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