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Attorneys for Plaintiff ABIGAIL CHAMBERLAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF YOLO

ABIGAIL CHAMBERLAN, an individual(s),
on behalf of herself and on behalf of all persons
similarly situated,

Plaintiff,

vs.

CLASSIC VMS, INC., (dba WOODLAND
BODY WORKS and COLLISION PROS), a
California Corporation; COLLISION PRO'S
INC., a California Corporation; and DOES 1
through 50, Inclusive,

Defendants.

Case No. CV2022-0652

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

Date: December 5, 2023

Time: 10:00 a.m.

Judge: Hon. Samuel T. McAdam

Dept.: 10

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

2 PLEASE TAKE NOTICE that on December 5, 2023, at 10:00 a.m., or as soon
3 thereafter as counsel may be heard, in Department 10 of the Yolo Superior Court, the Honorable Judge
4 Sameul T. McAdam presiding, plaintiff Abigail Chamberlan will, and hereby does, move this Court
5 to:

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

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Pendency of Class Action Settlement
11 and Final Hearing Date to the Settlement Class attached as Exhibit A to the Agreement;

12 4. Appoint Plaintiff Abigail Chamberlan as the Class Representative;

13 5. Appoint the JCL Law Firm, APC and Zakay Law Group, APLC as Class Counsel; and

14 6. Set a hearing date for final approval of the settlement.

15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3)
17 the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
18 Declaration of Abigail Chamberlan; (6) the Class Action and PAGA Settlement Agreement and exhibit
19 attached thereto; (7) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA
20 Settlement and exhibits attached thereto; (8) the records, pleadings, and papers filed in this action; and
21 (9) upon such other documentary and oral evidence or argument as may be presented to the Court at
22 or prior to the hearing of this Motion.

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

25 Dated: November 6, 2023

ZAKAY LAW GROUP, APLC

26 By: 
27 Jackland K. Hom, Esq.
28 Attorney for Plaintiff