

**ZAKAY LAW GROUP, APLC**

Shani O. Zakay (State Bar #277924)

[shani@zakaylaw.com](mailto:shani@zakaylaw.com)

Jackland K. Hom (State Bar #327243)

[jackland@zakaylaw.com](mailto:jackland@zakaylaw.com)

Rachel Newman (State Bar #350826)

[rachel@zakaylaw.com](mailto:rachel@zakaylaw.com)

Jennifer M. Gerstenzang (State Bar #279810)

[jenny@zakaylaw.com](mailto:jenny@zakaylaw.com)

Jaclyn Joyce (State Bar #285124)

[jaclyn@zakaylaw.com](mailto:jaclyn@zakaylaw.com)

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 255-9047

**JCL LAW FIRM, APC**

Jean-Claude Lapuyade (State Bar #248676)

[jlapuyade@jcl-lawfirm.com](mailto:jlapuyade@jcl-lawfirm.com)

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 599-8292

Attorneys for PLAINTIFFS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

ALEXANDER PEGUES, JR. and MANOLO PEREZ, individuals, on behalf of themselves and on behalf of all persons similarly situated,

Plaintiffs,

v.

ELINK RECRUITING SOLUTIONS, INC., a Georgia Corporation; GLOBAL MAIL, INC., an Ohio Corporation; and DOES 1-50, Inclusive,

Defendants.

Case No. 22STCV18259

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

Date: August 28, 2025

Time: 10:30 a.m.

Judge: Hon. Carolyn B. Kuhl

Dept.: 12

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

2 PLEASE TAKE NOTICE that on August 28, 2025, at 10:30 a.m., or as soon thereafter as  
3 counsel may be heard, in Department 12 of the Los Angeles Superior Court, the Honorable Carolyn  
4 B. Kuhl presiding, plaintiffs ALEXANDER PEGUES, JR. and MANOLO PEREZ will, and hereby  
5 do, move this Court to:

6 1. Preliminarily approve the settlement described in the Class Action and PAGA  
7 Settlement Agreement (“Agreement”), attached as Exhibit 1 to the Declaration of Jackland K. Hom,  
8 Esq. filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

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

12 4. Appoint Plaintiffs ALEXANDER PEGUES, JR. and MANOLO PEREZ as the Class  
13 Representatives;

14 5. Appoint Jean-Claude Lapuyade of the JCL Law Firm, APC and Shani Zakay of the  
15 Zakay Law Group, APLC as Class Counsel; and

16 6. 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 Action and PAGA Settlement; (3)  
19 the Declaration of Jackland K. Hom, Esq.; (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the  
20 Declaration of Shani O. Zakay, Esq.; (6) the Declaration of Manolo Perez; (7) the Declaration of the  
21 Settlement Administrator; (8) the Class Action and PAGA Settlement Agreement and exhibits  
22 attached thereto; (9) the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA  
23 Settlement and exhibits attached thereto; (10) the records, pleadings, and papers filed in this action;  
24 and (11) upon such other documentary and oral evidence or argument as may be presented to the Court  
25 at or prior to the hearing of this Motion.

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

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4 Dated: June 23, 2025

**ZAKAY LAW GROUP, APLC**

5 By: Rachel Newman  
6 Rachel Newman, Esq.  
7 Attorneys for Plaintiff  
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