

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

Jennifer Gerstenzang (State Bar #279810)

jenny@zakaylaw.com

Jaclyn Joyce (State Bar #285124)

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

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 599-8292

Attorneys for Plaintiff MARIA VAZQUEZ

(Additional Counsel on Following Pages)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

*Maria Vazquez v. MT Collision Centers, Inc.,
MT Collision Centers, LLC, and Crash
Champions, LLC,
Los Angeles County Court Case No.
22STCV34689*

*Arturo Basulto v. MT Collision Centers, LLC
and MT Collision Centers, Inc.,
Orange County Court Case No. 30-2023-
01340093-CU-OE-CXC*

*Jose Maravilla v. Crash Champions, LLC,
Los Angeles County Superior Court Case No.
24STCV00728*

*Jose Maravilla v. Crash Champions, LLC,
Los Angeles County Superior Court Case No.
24STCV07635*

Anthony Rodarte v. Crash Champions, LLC,

Judicial Counsel Coordination Proceeding

No. JCCP5340

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

Date: May 5, 2026

Time: 10:00 a.m.

Judge: Hon. Timothy Patrick Dillon
Dept.: 15

*Santa Clara County Superior Court Case No.
24CV432852*

MOORADIAN LAW, APC

Zorik Mooradian, Esq.

zorik@mooradianlaw.com

Haik Hacopian, Esq.

haik@mooradianlaw.com

24007 Ventura Blvd., Suite 210

Calabasas, CA 91302

Telephone: (818) 487-1998

Facsimile: (888) 783-1030

Attorneys for Plaintiff ARTURO BASULTO

LAVI & EBRAHIMIAN, LLP

Joseph Lavi, Esq.

jlavi@lelawfirm.com

Vincent C. Granberry, Esq.

vgranberry@lelawfirm.com

Jovahn Wiggins, Esq.

jwiggins@lelawfirm.com

Cassandra Castro, Esq.

ccastro@lelawfirm.com

Eve Howe, Esq.

ehowe@lelawfirm.com

8889 W. Olympic Blvd., Suite 200

Beverly Hills, CA 90211

Telephone: (310) 432-0000

Facsimile: (310) 432-0001

Attorneys for Plaintiff JOSE MARAVILLA

E&L, LLP

David Lavi, Esq.

dlavi@ebralavi.com

Arie Ebrahimian, Esq.

arie@ebralavi.com

6300 Wilshire Blvd., Suite 1740

Los Angeles, CA 90048

Telephone: (213) 213-0000

Facsimile: (213) 213-0025

Attorneys for Plaintiff ANTHONY RODARTE

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LITTLER MENDELSON, P.C.

Angela J. Rafoth, Esq. (SBN #241966)

arafoth@littler.com

Alvin Arceo, Esq. (SBN #342387)

aarceo@littler.com

101 Second Street, Suite 1000

San Francisco, CA 94105

Telephone: (415) 433-1940

Facsimile: (415) 399-8490

Attorneys for Defendants

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

2 PLEASE TAKE NOTICE that on May 5, 2026, at 10:00 a.m., or as soon thereafter as counsel
3 may be heard, in Department 15 of the Los Angeles Superior Court, the Honorable Timothy Patrick
4 Dillon presiding, Plaintiffs Maria Vazquez, Arturo Basulto, Jose Maravilla, and Anthony Rodarte
5 (“Plaintiffs”) will, and hereby do move this Court to:

6 1. Preliminarily approve the settlement described in the Joint Stipulation of Class and
7 PAGA Settlement and Release (“Agreement”) attached as Exhibit 1 to the Declaration Shani O. Zakay
8 filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Settlement of Class and Representative
11 Action (“Class Notice”) attached as Exhibit A to the Agreement;

12 4. Plaintiffs Maria Vazquez, Arturo Basulto, Jose Maravilla, and Anthony Rodarte as Class
13 Representatives;

14 5. Appoint Jean-Claude Lapuyade, Esq. of the JCL Law Firm, APC, Shani O. Zakay, Esq.
15 of Zakay Law Group, APLC, Zorik Mooradian and Haik Hacopian of Mooradian Law, APC; Joseph
16 Lavi, Vincent C. Granberry, and Jovahn Wiggins of Lavi & Ebrahimian, LLP; and David Lavi and
17 Arie Ebrahimian of E&L, LLP, as Class Counsel; and

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

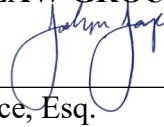
19 7. This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points
20 and Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement;
21 (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5)
22 the Declaration of James Clark, Esq.; (6) the Declaration of Haik Hacopian, Esq.; (7) the Declaration
23 of Zorik Mooradian, Esq.; (8) the Declaration of David Lavi, Esq.; (9) the Declaration of Maria
24 Vazquez; (10) the Declaration of Arturo Basulto; (11); the Declaration of Anthony Rodarte; (12); the
25 Declaration of Jose Maravilla; (12) the Declaration of the Settlement Administrator; (8) the Agreement
26 and Class Notice attached thereto; (9) the [Proposed] Order Granting Preliminary Approval of Class
27 Action and PAGA Settlement and exhibits attached thereto; (10) the records, pleadings, and papers
28 filed in this action; and (11) upon such other documentary and oral evidence or argument as may be

1 presented to the Court at or prior to the hearing of this Motion.

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

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5 Dated: March 18, 2026

ZAKAY LAW GROUP, APLC

6 By: 
7 Jaclyn Joyce, Esq.
8 Attorney for Plaintiff Maria Vazquez
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