

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
Julieann Alvarado (State Bar #334727)
Rachel N. Newman (State Bar #350826)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com
julieann@zakaylaw.com
rachel@zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF BUTTE

JAMAL SHABAZZ and JOSEPH
CASTANEDA, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiff,

v.

MANN & COMPANY, INC., a California
Corporation; and DOES 1 through 50,
Inclusive,

Defendants.

Case No. 22CV02669

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

Date: September 25, 2024
Time: 9:00 AM

Judge: Hon. Tamara Mosbarger
Dept.: 1

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

2 PLEASE TAKE NOTICE that on September 25, 2024, or as soon thereafter as counsel may be
3 heard, in Department 1 of the Butte County Superior Court, the Honorable Judge Tamara Mosbarger
4 presiding, plaintiffs Jamal Shabazz and Joseph Castaneda will, and hereby do, 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 A to the
7 Declaration of Jean-Claude Lapuyade, Esq., filed concurrently herewith;

8 2. Conditionally certify the Settlement Class;

9 3. Approve distribution of the proposed Notice of Pendency of Class and Representative
10 Action Settlement and Final Hearing Date;

11 4. Appoint Plaintiffs JAMAL SHABAZZ and JOSEPH CASTANEDA as the Class
12 Representatives;

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

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

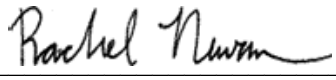
15 This Motion is based upon: (1) this Notice of Motion; (2) the Memorandum of Points and
16 Authorities in Support of Motion for Preliminary Approval of Class Action Settlement; (3) the
17 Declaration of Shani O. Zakay, Esq., (4) the Declaration of Jean-Claude Lapuyade, Esq.; (5) the
18 Declaration of Jamal Shabazz; (6) the Declaration of Joseph Castaneda; (7) the Stipulation of
19 Settlement of Class and PAGA Action Claims and Release of Claims and exhibit attached thereto; (8)
20 the [Proposed] Order Granting Preliminary Approval of Class Action Settlement and exhibits attached
21 thereto; (9) the records, pleadings, and papers filed in this action; and (10) upon such other
22 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
23 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: August 28, 2024

ZAKAY LAW GROUP, APLC

5 By: 

6 Rachel Newman, Esq.
7 Attorneys for Plaintiff
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