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Attorneys for Plaintiff MICHAEL HARRINGTON

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

MICHAEL HARRINGTON, an individual, in
his representative capacity on behalf of the
State of California and fellow Aggrieved
Employees,

Plaintiff,

vs.

GENESIS PRIVATE SECURITY, INC., (fka
ATLAS PRIVATE SECURITY, INC.), a
California Corporation; ATLAS PRIVATE
SECURITY, INC., a California Corporation;
and DOES 1-50, Inclusive;

Defendants.

Case No.: RG21105476

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION TO APPROVE PAGA
SETTLEMENT**

Hearing Date: September 15, 2023
Hearing Time: 9:00 A.M.

Judge: Hon. Grillo
Dept.: 21

Reservation ID: 154134417178

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on September 15, 2023, or as soon
3 thereafter as the matter can be heard, in Department 21 of the above-entitled Court, Plaintiff
4 Michael Harrington (“Plaintiff”), pursuant to labor Code section 2699(1)(2), will apply for an Order
5 Approving the parties’ PAGA Settlement and entry of the agreed-upon Proposed Final Judgment,
6 which are filed concurrently herewith. Defendants have advised that they do not oppose Plaintiff’s
7 Motion.

8 This unopposed Motion will be made on the grounds that the proposed PAGA Settlement
9 is fair, adequate, reasonable, and in the best interests of the State of California and the aggrieved
10 employees. This Motion will be based on this notice, the accompanying points and authorities, the
11 Declarations of Shani O. Zakay and Jean-Claude Lapuyade and the complete files and records in
12 this action.

13 Plaintiff respectfully request that, pursuant to the specific terms (including timing and
14 manner) as set forth in the executed PAGA Settlement Agreement (the “Settlement Agreement”)
15 and assuming conditions are met therein, the Court (1) grant approval of the parties’ PAGA
16 Settlement; (2) appoint ILYM Group as the Settlement Administrator; (3) direct that the agreed-
17 upon Notice of PAGA Settlement be approved and sent to the allegedly aggrieved employees with
18 their settlement share checks in the manner set forth in the Settlement Agreement; and (4) award
19 PAGA Counsel their fees’ and litigation costs. Plaintiff also requests that the Court sign and enter
20 the proposed PAGA Settlement Approval Order and Final Judgment, filed concurrently herewith.

21
22 Dated: August 22, 2023

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23
24 By:



25 Jean-Claude Lapuyade, Esq.

26 Shani O. Zakay, Esq.

27 Attorney for Plaintiff and the Aggrieved Employees
28



Reschedule a Reservation

Reservation

Reservation ID:
154134417178

Reservation Type:
Motion re: (Approval of PAGA Settlement)

Case Number:
RG21105476

Case Title:
Harrington VS Genesis Private Security, Inc.

Filing Party:
Michael Harrington (Plaintiff)

Location:
Rene C. Davidson Courthouse - Department 21

Date/Time:
July 14th 2023, 9:00AM

Status:
RESERVED

Number of Motions:
1

Motions to Reschedule

Motion re: (Approval of PAGA Settlement)

Reschedule To:

Date: 09/15/2023 9:00 AM

Location: Rene C. Davidson Courthouse - Department 21

Fees

Description	Fee	Qty	Amount
Reschedule Fee	1.00	1	1.00

Description	Fee	Qty	Amount
TOTAL			\$1.00

Payment	
Amount: \$1.00	Type: Visa
Account Number: XXXX1086	Authorization: 01661G
Payment Date: 1969-12-31	

 Print Receipt

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