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Attorneys for Plaintiff JACOB GRIFFIN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JACOB GRIFFIN, on behalf of the State of
California, as a private attorney general,

Plaintiff,

vs.

COURTESY CHEVROLET CENTER, a
California Corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No: 37-2022-00005485-CU-OE-CTL

Action Filed: February 14, 2022

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

Date: July 7, 2023

Time: 10:30 a.m.

Dept.: C-64

Judge: Hon. Loren G. Freestone

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on July 7, 2023, or as soon thereafter
3 as the matter can be heard, in Department C-64 of the above-entitled Court, Plaintiff JACOB
4 GRIFFIN ("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 Order, which are
6 filed concurrently herewith. Defendant COURTESY CHEVROLET CENTER ("Defendant") has
7 advised that it does not oppose Plaintiff's Motion.

8 This unopposed Motion will be made on the grounds that the proposed PAGA Settlement is
9 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 requests that, pursuant to the specific terms (including timing and
14 manner) as set forth in the executed Joint Stipulation of Settlement of PAGA Action and Release of
15 PAGA Claims (the "Settlement Agreement") and assuming conditions are met therein, the Court
16 (1) grant approval of the parties' PAGA Settlement; (2) appoint ILYM Group as the Settlement
17 Administrator; (3) direct that the agreed-upon Notice of PAGA Settlement be approved and sent to
18 the allegedly aggrieved employees with their settlement share checks in the manner set forth in the
19 Settlement Agreement; (4) award Plaintiff his service award; and (5) award PAGA Counsel their
20 fees' and litigation costs. Plaintiff also requests that the Court sign and enter the Proposed Order
21 Granting Plaintiff's Motion to Approve PAGA Settlement and Judgment, filed concurrently
22 herewith.

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: June 12, 2023

ZAKAY LAW GROUP, APLC



Shani O. Zakay, Esq.
Attorney for Plaintiff and the Aggrieved
Employees