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ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MONTEREY

RICHARD SANCHEZ, an individual, on
behalf of himself and on behalf of all persons
similarly situated,

Plaintiff,

v.

SALINAS LINCOLN MERCURY, INC., a
California Corporation; and Does 1 through 50,
Inclusive,

Defendants.

Case No: 21CV0001535

Action Filed: May 10, 2021

**NOTICE OF MOTION AND MOTION TO
APPROVE PAGA SETTLEMENT**

Date: October 28, 2022

Time: 8:30 a.m.

Dept.: 15

Judge: Hon. Thomas W. Wills

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

2 YOU ARE HEREBY NOTIFIED THAT on October 28, 2022 at 8:30 a.m. in Department 15
3 of the above-entitled Court before the Honorable Judge Thomas Wills, Plaintiff RICHARD
4 SANCHEZ ("Plaintiff") will apply for an order approving the PAGA settlement in accordance with
5 Labor Code §2699(l). The proposed settlement is set forth in the accompanying Private Attorney
6 General Act (Labor Code Section 2698 *et seq.*) Stipulation of Settlement of PAGA Claims and
7 Release of PAGA Claims (the "Settlement Agreement").

8 This motion will be based on this notice of motion and motion, the accompanying points and
9 authorities, the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq.,
10 the Settlement Agreement between the parties, and the complete files and records in this action. All
11 parties have approved the Settlement Agreement and have met and conferred regarding the motion;
12 therefore, this motion is not opposed by Defendant. The Labor Workforce Development Agency has
13 been served with this motion and the Settlement Agreement as set forth in the accompanying
14 Declaration of Shani O. Zakay. As this Motion is unopposed, the Parties respectfully request relief
15 from the page limit requirement set by California Rules of Court, Rule 3.1113(d).

16 DATED: July 18, 2022
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18 **ZAKAY LAW GROUP, APLC**

19 By: 
20 _____

21 Shani O. Zakay
22 Julieann Alvarado
23 Attorneys for Plaintiff
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