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Attorneys for Plaintiff ELIAS KASER

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

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

Plaintiffs,

vs.

AVIATION CONSULTANTS, INC. a
California Corporation; ACI JET ORANGE
COUNTY, LLC, a Limited Liability Company;
ACI JET SLO COUNTY, LLC, a Limited
Liability Company; and DOES 1-50, Inclusive,

Defendants.

Case No: 30-2021-01191204-CU-OE-CXC

**NOTICE OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Hearing Date: September 16, 2021
Hearing Time: 2:00 p.m.

Honorable Judge Peter J. Wilson
Department CX102

Trial Date: Not Set
Action Filed: March 23, 2021

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

2 YOU ARE HEREBY NOTIFIED THAT at 2:00PM on September 16, 2021, or as soon
3 thereafter as the matter can be heard, in Department CX102 of the above-entitled Court, before
4 the Honorable Judge Peter J. Wilson, Plaintiff ELIAS KASER (“Plaintiff”) will apply for an order
5 approving the PAGA settlement in accordance with Labor Code §2699(l). The proposed
6 settlement is set forth in the accompanying Private Attorney General Act (Labor Code Section
7 2698 *et seq.*) Settlement Agreement and Limited Release (the “Agreement”).

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

16 DATED: August 13, 2021

ZAKAY LAW GROUP, APLC

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18 By: 
19 Shani O. Zakay
20 Attorneys for Plaintiff
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