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Attorneys for Plaintiffs GERARDO VALADEZ and MIGUEL DIAZ

(Additional Counsel on Following Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

GERARDO VALADEZ, MIGUEL DIAZ,
LUPE RODRIGUEZ, and ARTHUR
BEBEKYAN, in a Representative capacity
only, and on behalf of other members of the
general public similarly situated,

Plaintiff,

v.

CALIBER HOLDINGS CORP; CALIBER
COLLISION TRANSPORT SERVICES
LLC; and DOES 1-10, inclusive.

Defendants

CASE NO. 37-2020-00015935-CU-OE-CTL

(Representative Action only)

**NOTICE OF PLAINTIFF'S UNOPPOSED
EX PARTE APPLICATION SEEKING (1)
TO AMEND COMPLAINT (FOR
PURPOSES OF SETTLEMENT) (2)
APPROVAL OF PAGA SETTLEMENT;
OR, IN THE ALTERNATIVE, (3) AN OST
TO HEAR A NOTICED MOTION RE
PAGA SETTLEMENT APPROVAL**

Date: April 26, 2022

Time: 8:30 a.m.

Dept.: C-73

Judge: Hon. Joel R. Wohlfeil

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12 Attorneys for Plaintiffs LUPE RODRIGUEZ and ARTHUR BEBEKYAN
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1 TO ALL PARTIES HEREIN AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on April 26, 2022 at 8:30 a.m., or as soon thereafter as the
3 matter may be heard in Department C-73 of the San Diego Superior Court, 330 West Broadway, San
4 Diego, California 92101, the Honorable Joel R. Wohlfeil, presiding, Plaintiffs in a Representative
5 capacity only, and on behalf of other members of the general public similarly situated, seek the Court's
6 Approval of the recent PAGA settlement.

7 Therefore, this application is based on this Notice, the Memorandum of Points and Authorities
8 in support thereof, the Declaration of Eric K. Yaeckel, and the Proposed Order.

9
10 Dated: April 25, 2022

SULLIVAN & YAECKEL LAW GROUP, APC

Eric Yaeckel

12 Eric K. Yaeckel
13 Plaintiffs GERARDO VALADEZ and MIGUEL DIAZ,
14 in a Representative capacity only, and on behalf of other
15 members of the general public similarly situated
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