

Eric K. Yaeckel [CSB No. 274608]
yaeckel@sullivanlawgroupapc.com

Ryan T. Kuhn [CSB No. 324538]
ryan@sullivanlawgroupapc.com

SULLIVAN & YAECKEL LAW GROUP, APC
2330 Third Avenue
San Diego, California 92101
(619) 702-6760 * (619) 702-6761 FAX

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, ARTHUR
BEBEKYAN, and SCOTT WODIN, 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 FILE A CONSOLIDATED
COMPLAINT (FOR PURPOSES OF
SETTLEMENT), and (2) APPROVAL OF
PAGA SETTLEMENT**

Date: May 17, 2022

Time: 8:30 a.m.

Dept.: C-73

Judge: Hon. Joel R. Wohlfeil

1 Joseph Lavi, Esq. (SBN 209776)
jlavi@lelawfirm.com
2 Vincent C. Granberry, Esq. (SBN 276483)
vgranberry@lelawfirm.com
3 Pooja V. Patel, Esq. (SBN 317891)
ppatel@lelawfirm.com
4 **LAVI & EBRAHIMIAN, LLP**
8889 W. Olympic Blvd., Suite 200
5 Beverly Hills, California 90211
Telephone: (310) 432-0000
6 Facsimile: (310) 432-0001

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8 Sahag Majarian II, Esq. (State Bar No. 146621)
Law Office of Sahag Majarian II
E-Mail: sahagii@aol.com
9 18250 Ventura Boulevard
Tarzana, California 91356
10 Telephone: (818) 609-0807
Facsimile: (818) 609-0892
11

12 Attorneys for Plaintiffs LUPE RODRIGUEZ and ARTHUR BEBEKYAN

13 Justin A. Morello, Esq. (SBN 239250)
justin@morellolawpc.com
14 **Morello Law, P.C.**
3170 4th Ave, Suite 250
San Diego, CA 92103
15 Telephone: (619) 277-4677

16 Attorneys for Plaintiff SCOTT WODIN
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1 TO ALL PARTIES HEREIN AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on May 17, 2022 at 8:30 a.m., or as soon thereafter as the matter
3 may be heard in Department C-73 of the San Diego Superior Court, 330 West Broadway, San Diego,
4 California 92101, the Honorable Joel R. Wohlfeil, presiding, Plaintiffs in a Representative capacity
5 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

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

10 Dated: May 16, 2022

SULLIVAN & YAECKEL LAW GROUP, APC

Eric Yaeckel

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