

Armond M. Jackson, SBN 281547
Andrea M. Fernandez, SBN 295924
Jackson APC
2 Venture Plaza, Ste. 240
Irvine, CA 92618
Phone (949) 281-6857
Fax (949) 777-6218

Attorneys for Plaintiff Maria Velez

**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE - CIVIL COMPLEX CENTER**

MARIA VELEZ, as an individual and on
behalf of other similarly situated employees,

Plaintiff,

vs.

LEGACY FARMS, LLC., a California
corporation, LEGACY FARMS OF
CALIFORNIA, LLC, a California corporation,
LEGACY FARMS EMPLOYMENT
SERVICES COMPANY, INC., a California
corporation, and PRIORITY WORKFORCE,
INC, a California corporation and DOES 1-50,
inclusive,

Defendants.

Case No.: 30-2019-01120177-CU-OE-CXC

Assigned for all Purposes to Honorable:
Judge William Claster
Dept. CX 104

**NOTICE OF MOTION AND MOTION
FOR ORDER APPROVING
SETTLEMENT UNDER CALIFORNIA
LABOR CODE SECTION 2699 ET SEQ**

Hearing Date: February 4, 2022
Hearing Time: 9:00 a.m.
Department: CX104

Case filed: December 23, 2019
Trial date: TBD

Reservation ID: 73676985

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

3 PLEASE TAKE NOTICE that on February 4, 2022, 9:00 a.m., in Department CX 104 of
4 the Superior Court of California for the County of Orange, in the Civil Complex Center, located
5 at 751 West Santa Ana Boulevard, Santa Ana, CA 92701, Plaintiff will, and hereby does, move
6 for an order approving settlement of Plaintiff's penalty claims under the Private Attorney
7 Generals Act ("PAGA").

8 The basis for the motion is that the Plaintiff Maria Velez, Legacy Farms, LLC, Legacy
9 Farms of California, LLC, Legacy Farms Employment Services Company, Inc. and Priority
10 Workforce, Inc., have reached and fully executed a settlement of the above-entitled case that
11 disposes of the matter entirely. Pursuant to statute, settlement of the PAGA claims requires court
12 approval. (Cal Lab Code §2699(l)). Thus, Plaintiff seeks the Court's approval of the PAGA
13 claims.

14 This motion is based on this Notice, Plaintiff's Memorandum of Points and Authorities
15 filed concurrently herewith, and the Declaration of Armond Jackson, also filed concurrently
16 herewith, together with all the records on file in this action and oral argument that may be
17 presented at the time of hearing.
18
19
20

21 Dated: January 10, 2022

JACKSON APC
A PROFESSIONAL CORPORATION

24 By:/s/ Armond M. Jackson
25 Armond M. Jackson
26 Attorney for Plaintiff Maria Velez
27
28