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[Additional counsel listed on following page]

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

ISHAN BASU-KESSELMAN and TAI
TRAN, on behalf of the State of California,
as private attorneys general,

Plaintiffs,

v.

GARUDA LABS, INC. d/b/a
INSTAWORK; ADVANTAGE
WORKFORCE SERVICES, LLC; and
DOES 1 through 50, inclusive,

Defendants.

Case No. CGC-20-586542

REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT ("PAGA") SETTLEMENT**

Date: November 30, 2023

Time: 9:30 a.m.

Judge: Richard B. Ulmer, Jr.

Dept.: 302

Complaint filed: July 9, 2020

Trial date: Not set

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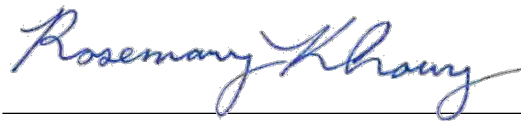
Attorneys for Plaintiffs

PLEASE TAKE NOTICE that on November 30, 2023 at 9:30 a.m. or as soon as the matter may be heard in Department 302 before the Honorable Richard B. Ulmer, Jr. of the Superior Court for the State of California, County of San Francisco, Civic Center Courthouse, located at 400 McAllister Street, San Francisco, California 94102, Plaintiffs Ishan Basu-Kesselman and Tai Tran ("Plaintiffs") will move this Court for an Order Granting Approval of a Private Attorneys General Act Settlement ("PAGA"), pursuant to California Labor Code sections 2698, *et seq.* The Motion will be made on the grounds that the proposed PAGA Settlement as set forth in the Private Attorneys General Act Settlement Agreement ("Settlement Agreement") is fair, reasonable and in the best interest of Plaintiffs and all other PAGA Settlement Group Members as defined in the Settlement Agreement.

The motion will be based on this Notice of Motion; the Memorandum of Points and Authorities; Declarations of PAGA Counsel Isam C. Khoury of Cohelan Khoury & Singer, Kyle Nordrehaug of Blumenthal Nordrehaug Bhowmik De Blouw LLP, and Jonathan Lebe of Lebe Law, APLC; Declarations of Plaintiffs Ishan Basu-Kesselman and Tai Tran; Declaration of Jodey Lawrence on behalf of Settlement Administrator Phoenix Class Action Administration Solutions; the Private Attorneys General Act Settlement Agreement (Exhibit "1" to the Khoury Declaration); all other papers and records on file in this action, and on such oral and documentary evidence as may be presented at the hearing on this Motion.

Respectfully submitted,

BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP
COHELAN KHOURY & SINGER
LEBE LAW, APLC



Dated: October 31, 2023

By: _____
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Attorneys for Plaintiffs