

GAINES & GAINES, APLC
Daniel F. Gaines (SBN 251488)
Alex P. Katofsky (SBN 202754)
27200 Agoura Road, Suite 101
Calabasas, California 91301
Telephone: (818) 703-8985
Facsimile: (818) 703-8984

*Attorneys for Plaintiff, Rita Navarro, on behalf of
herself and all other aggrieved employees*

LAW OFFICE OF SCOTT ERNEST WHEELER
Scott Ernest Wheeler (SBN 187998)
250 West First Street, Suite 216
Claremont, California 91711
Telephone: (909) 621-4988
Facsimile: (909) 621-4622

{Additional Counsel listed on following page}

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

RITA NAVARRO, on behalf of herself and all
“aggrieved employees” pursuant to Labor code
§ 2698 *et seq.*,

Plaintiff,

v.

TIRE STAFFING dba IT’S CALIBER, a
Nevada corporation, CALIBER GROUP
STAFFING, INC., a California corporation,
and DOES 1 through 10, inclusive,

Defendants.

JAMES D. HENRIQUEZ, individually, and on
behalf of all other aggrieved employees,

Plaintiff,

v.

TIRE STAFFING, doing business as IT’S
CALIBER, a Nevada corporation; and DOES
1 through 50, inclusive,

Defendants.

CASE NO.: CIVDS 2016343 Consolidated
with CIVDS 2021000

[Assigned for all purposes to the Honorable
David Cohn, Department S26]

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF SETTLEMENT
PURSUANT TO PRIVATE ATTORNEYS
GENERAL ACT (“PAGA”) FILED ON
BEHALF OF PLAINTIFFS’ JAMES D.
HENRIQUEZ AND RITA NAVARRO**

Date: April 28, 2022
Time: 10:00 a.m.
Dept: S-26

1 **THE WAND LAW FIRM, P.C.**

2 Aubry Wand (SBN 281207)

3 400 Corporate Pointe, Suite 300

4 Culver City, California 90230

5 Telephone: (310) 590-4503

6 Facsimile: (310) 590-4596

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
*Attorneys for Plaintiff, James D. Henriquez, on
behalf of himself and all other aggrieved
employees*

[illegible]

2
3
4
5
6

- 7
8
9
0
1
2
3
4
5

7
8
9
0

•

LAW OFFICE OF SCOTT ERNEST WHEELER

By: Scott Ernest Wheeler

GAINES & GAINES, APLC
Daniel F. Gaines
Alex P. Katosky

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THE WAND LAW FIRM, P.C.
Aubry Wand

*Attorneys for Plaintiff James D. Henriquez and the
other Aggrieved Employees*