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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

JILL TIZEKKER, on Behalf of the State of
California and Aggrieved Employees,

Plaintiffs,

v.

BEL-AIR BAY CLUB LTD., and DOES 1-
100 inclusive,
Defendant.

Case No. 20SMCV01006

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION TO APPROVE
SETTLEMENT PURSUANT TO
PRIVATE ATTORNEYS GENERAL ACT
OF 2004**

Date: April 4, 2022

Time: 8:30 AM

Department: P

1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on April 4, 2022 at 8:30 a.m., or as soon thereafter as the matter
3 may be heard, in Department P of the Los Angeles Superior Court, Santa Monica Courthouse, 1725
4 Main Street, Santa Monica, CA 90401, Plaintiff Jill Tizekker (“Plaintiff”) will and hereby does move
5 this Court for an order approving a settlement pursuant to the Private Attorneys General Act of 2004,
6 California Labor Code §§ 2698, *et seq.* (the “PAGA”). The proposed settlement resolves all claims
7 in the matter.

8 This motion is based upon this Notice; the Memorandum of Points and Authorities; the
9 Declaration of Carolyn Hunt Cottrell and exhibits attached thereto; the Declaration of Plaintiff Jill
10 Tizekker; all other records, pleadings, and papers filed in this action; and upon such other evidence
11 or argument as may be presented to the Court at the hearing on this motion.

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13 Dated: March 10, 2022

Respectfully submitted,

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17 Carolyn H. Cottrell
18 Caroline N. Cohen
19 Kristabel Sandoval
20 SCHNEIDER WALLACE
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22 *Attorneys for Plaintiff, on behalf of the State of*
23 *California and Aggrieved Employees*
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