

BRIAN J. MANKIN (Cal. State Bar No. 216228)
PETER J. CARLSON (Cal. State Bar No. 295611)
LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, California 92504
Telephone: (951) 320-1444
Facsimile: (951) 320-1445
brian@lmlfirm.com
peter@lmlfirm.com

DEEPAK GUPTA (admitted *pro hac vice*)
GUPTA WESSLER LLP
2001 K STREET, NW, SUITE 850 NORTH
WASHINGTON, DC 20006
Telephone: (202) 888-1741
deepak@guptawessler.com

Attorneys for Plaintiff Cinnamon Mills and the Class

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CINNAMON MILLS, individually,
on a representative basis, and on
behalf of all others similarly
situated,

Plaintiff,

vs.

TARGET CORPORATION, a
Minnesota Corporation; and DOES 1
through 20, inclusive,

Defendants.

No. 5:20-CV-01460-JGB-KKx

**NOTICE OF PROPOSED PAGA
SETTLEMENT**

Cal. Lab. Code § 2698 *et seq.*

Date: November 13, 2023
Time: 9:00 a.m.
Judge: Hon. Jesus G. Bernal
Courtroom: 1
3470 Twelfth Street
Riverside, California 92501

Complaint filed: June 10, 2020
SAC filed: March 11, 2021

To the California Labor and Workforce Development Agency (“LWDA”):

PLEASE TAKE NOTICE that the parties to this wage-and-hour class action have settled the case, which includes settlement of a derivative Labor Code Private Attorneys General Act (“PAGA”) claim. In accordance with PAGA, Cal. Lab. Code § 2699(l)(2), plaintiff Cinnamon Mills provides this notice to the LWDA and attaches a copy of the parties’ Settlement Agreement and motion for preliminary approval of the settlement.

If you have questions about this notice or the enclosed materials, please contact counsel for the parties as follows:

To Plaintiff:

Brian J. Mankin
Peter J. Carlson
Lauby, Mankin & Lauby LLP
5198 Arlington Avenue, PMB 513
Riverside, California 92504
Telephone: (951) 320-1444
Facsimile: (951) 320-1445
E-mail: brian@lmlfirm.com
peter@lmlfirm.com

Deepak Gupta
Gupta Wessler LLP
2001 K Street, NW
Suite 850 North
Washington, D.C. 20006
Telephone: (202) 888-1741
E-mail: deepak@guptawessler.com

To Target:

Jeffrey D. Wohl
Lindsey C. Jackson
Paul Hastings LLP
101 California Street, 48th Floor
San Francisco, California 94111
Telephone: (415) 856-7000
Facsimile: (415) 856-7100
E-mail: jeffwohl@paulhastings.com
lindseyjackson@paulhastings.com

1 Dated: October 13, 2023

2 BRIAN J. MANKIN
3 PETER J. CARLSON
4 LAUBY, MANKIN & LAUBY LLP

5 DEEPAK GUPTA
6 NEIL K. SAWHNEY
7 GUPTA WESSLER LLP

8 By: /s/ Brian J. Mankin
9 Brian J. Mankin
10 Attorneys for Plaintiff Cinnamon Mills and
11 the Class
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28