

1 Manny M. Starr (SBN 319778)
2 manny@frontierlawcenter.com
3 Daniel V. Ginzburg (SBN 327338)
4 dan@frontierlawcenter.com
5 FRONTIER LAW CENTER
6 23901 Calabasas Road, #2074
7 Calabasas, CA 91302
8 Telephone: (818) 914-3433
9 Facsimile: (818) 914-3433

10 Attorneys for Plaintiff
11 Robert Navarro

12
13 SUPERIOR COURT OF CALIFORNIA

14 COUNTY OF LOS ANGELES

15 ROBERT NAVARRO, on behalf of himself
16 and all other Aggrieved Employees

17 Plaintiff,

18 v.

19 ALLIED PRIVATE INVESTIGATION &
20 SECURITY SERVICES, INC. and DOES 1 to
21 100, inclusive,

22 Defendants.

) NO. 20STCV16481

)
) **NOTICE OF PLAINTIFF'S MOTION**
) **FOR COURT APPROVAL OF PAGA**
) **SETTLEMENT**

)
) *Assigned to Hon. Judge Timothy Patrick*
) *Dillon*

) Date: June 15, 2021

) Time: 8:30 a.m

) Dept: 73

) Reservation No.: 403583638683

)
) Action Filed: April 30, 2020
)

23 PLEASE TAKE NOTICE that on June 15, 2021, at 8:30 a.m., or as soon thereafter as the
24 matter may be heard before the Honorable Judge Timothy Patrick Dillon of the Superior Court of
25 California, Country of Los Angeles, located at 111 N. Hill Street, Los Angeles, CA 90012.
26 Plaintiff Robert Navarro ("Plaintiff") will and hereby does move for entry of an order of judgement
27 as follows:
28

1 1. Granting approval, pursuant to California *Labor Code* §2699, subd. (l)(2) of the
2 proposed settlement between Plaintiff and Defendant Allied Private Investigation & Security
3 Services, Inc., (“Allied”) of the claims brought pursuant to the Private Attorneys General Act of
4 2004 (“PAGA”) as set forth in the PAGA Settlement Agreement (“Settlement Agreement”),
5 attached as Exhibit 1 to the Declaration of Manny Starr;

6 2. Approving the Net Distribution Amount payable to the State of California and
7 Aggrieved Employees as authorized by California *Labor Code* §2699(i);

8 3. Appointing Phoenix Settlement Administrators as the Settlement Administrator;

9 4. Directing Defendant to transmit the settlement funds to the Settlement
10 Administrator in the total amount of \$120,000.00 as set forth in the Settlement Agreement;

11 5. Directing the Settlement Administrator to distribute the settlement funds to the
12 Aggrieved Employees under a cover letter in the form and content substantially similar to Exhibit
13 A of the [proposed] Order, and distributing funds to the Labor and Workforce Development
14 Agency (“LWDA”), Plaintiff’s Counsel, and for Settlement Administration Costs, in accordance
15 with the terms of the Settlement Agreement;

16 6. Awarding Plaintiff’s Counsel the amount of \$40,000.00 as compensation for
17 reasonable attorneys’ fees (“Attorneys’ Fees Payment”), \$7,440.80 as reimbursement of litigation
18 costs and expenses (“Litigation Costs Payment”), \$4,250.00 for Settlement Administration Costs,
19 and \$12,000.00 to Plaintiff as a Representative PAGA Plaintiff.

20 This motion is based on this Notice of Motion and Motion, the Memorandum of Points and
21 Authorities, the Settlement Agreement, the Declaration of Manny Starr, the pleadings and other
22 records on file with the Court in this matter, and such evidence and oral argument as may be
23 presented at the hearing on this motion.

24
25 Date: May 19, 2021

Manny Starr
Attorney for Plaintiff,
Robert Navarro