

1 James R. Hawkins (SBN 192925)
James@Jameshawkinsaplc.com
2 Christina M. Lucio (SBN 253677)
Christina@Jameshawkinsaplc.com
3 **JAMES HAWKINS APLC**
4 9880 Research Drive, Suite 200
Irvine, California 92618
5 Telephone: (949) 387-7200
Facsimile: (949) 387-6676

6 Attorneys for Plaintiff PEDRO AYALA and EMI BRUEMMER,
7 on behalf of themselves and in their representative
capacity as private attorneys general

8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
9
10 **COUNTY OF LOS ANGELES**

11 PEDRO AYALA and EMI BRUEMMER, on
behalf of themselves and in their representative
12 capacity as private attorneys general,

13 Plaintiffs,

14 v.

15 MACY'S WEST STORES, INC., an Ohio
Corporation, DOING BUSINESS AS MACY'S,
16 and DOES 1-50, inclusive,

17 Defendants.
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Case No. 20STCV34182

Assigned For All Purposes to:
Hon. Elihu M. Berle

**NOTICE OF MOTION AND
MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

Reservation ID: ZF2472633611

Date: August 22, 2024
Time: 8:30 a.m.
Dept: 6

Complaint Filed: September 3, 2020
FAC Filed: February 11, 2021
SAC Filed: June 14, 2021
Trial: Not Set

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

2 **PLEASE TAKE NOTICE** that on August 22, 2024 at 8:30 a.m. in Department 6 of the Los
3 Angeles Superior Court, Spring Street Courthouse, located at 312 North Spring Street, Los Angeles,
4 California 90012, Plaintiff Bruemmer (“Plaintiff”) will, and hereby does, move this Court for: (1) an
5 Order approving the Parties’ PAGA Settlement Agreement (“Settlement”) (attached as **Exhibit 1** to
6 the Declaration of James R. Hawkins, submitted concurrently herewith) and ordering the Parties to
7 carry out the terms of the Settlement; and (2) and entry of a final Judgment thereon.

8 This Motion will be based on this notice, the attached memorandum of points and authorities
9 filed contemporaneously herewith, the Parties’ PAGA Settlement Agreement, the Declarations of
10 James R. Hawkins and Emi Bruemmer, as well as upon the pleadings, documents, memoranda, and
11 other records on file with the Court in this matter, and upon such other and further oral and/or
12 documentary evidence as may be properly presented at the hearing on this matter.

13 Pursuant to California Labor Code § 2699(1)(2), a copy of the Settlement Agreement was filed
14 with the LWDA on July 22, 2024 (Declaration of James R. Hawkins, **Exhibit 4.**)

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16 DATED: July 22, 2024

JAMES HAWKINS APLC

17
18 By:



James R. Hawkins
Christina M. Lucio
Mitchell J. Murray

Attorneys for Plaintiffs
PEDRO AYALA and EMI BRUEMMER on
behalf of themselves and in their representative
capacity as private attorneys general