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Attorneys for Plaintiff ALAHJAH BROWN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

ALAHJAH BROWN, on behalf of the State of
California, as a private attorney general,

Plaintiffs,

v.

NRI USA, LLC, a California Limited Liability
Company, and DOES 1 through 50, inclusive,

Defendant.

Case No: CIVSB 2028407

**PLAINTIFFS' NOTICE OF UNOPPOSED
MOTION FOR PAGA SETTLEMENT
APPROVAL**

Hearing Date: July 6, 2022

Hearing Time: 10:00am

Judge: Hon. David Cohn

Dept.: S26

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED that at 10:00 a.m. on July 6, 2022 or as soon thereafter as
3 the matter can be heard, in Department S26 of the above entitled Court before the Honorable David
4 Cohn presiding, Plaintiff ALAHJAH BROWN (“Plaintiff”) will apply for an order approving the
5 PAGA Settlement, in accordance with Labor Code §2699(l). Plaintiffs’ Motion for Approval of
6 PAGA Settlement (“Approval Motion”) is based on this notice, the accompanying points and
7 authorities, the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade,
8 Esq., the Declaration of Nicholas De Blouw, Esq. and the complete files and records in this action.

9 As this Approval Motion is unopposed, the Parties respectfully request relief from the page
10 limitation set forth in California Rules of Court, Rule 3.1113(d).

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12 Dated: April 19, 2022

ZAKAY LAW GROUP, APC

13 By: _____

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