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Attorneys for Plaintiffs
NICHOLAS MERTZ, and Other Aggrieved
Employees and On Behalf of the
General Public as Private Attorneys General

**SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF BUTTE**

NICHOLAS MERTZ, On Behalf of
Himself and All Others Similarly Situated
and On Behalf of the General Public as
Private Attorneys General ;

Plaintiffs,

v.

PACIFIC PERSONNEL SERVICES,
INC., a California Corporation; and
DOES 1 through 10,

Defendants.

Case No. 20CV02075

**NOTICE OF MOTION FOR APPROVAL OF
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT SETTLEMENT;**

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

2 **PLEASE TAKE NOTICE** that on November 17, 2021 at 9:00 am or as soon thereafter as
3 the matter may be heard in Department 6 of the above-entitled Court, located at 1775 Concord
4 Avenue, Chico, CA 95928, Honorable Judge Stephen Benson, Plaintiff Nicholas Mertz will, and
5 hereby does, move the Court, pursuant to Labor Code § 2699 et seq., for an order approving the
6 Private Attorney General Act (aka "PAGA") settlement.

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10 Dated:

West Coast Employment Lawyers

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12 By:  _____

13 Ronald L. Zambrano Esq.
14 *Attorneys for Plaintiff and Aggrieved*
15 *Employees*
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1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of eighteen
3 and not a party to the within action. My business address is 1147 South Hope Street, Los Angeles, CA
4 90015.

5 On November 3, 2021, I served the foregoing documents described as: **NOTICE OF**
6 **MOTION FOR APPROVAL OF APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT**
7 **SETTLEMENT** on the interested parties in this action by placing a true copy or original thereof
8 enclosed in a sealed envelope, addressed as follows:

9 RYAN L. EDDINGS, Esq.
10 ANDREW H. WOO, Bar No. 261120
11 LITTLER MENDELSON, P.C.s
12 5200 North Palm Avenue, Suite 302
13 Fresno, CA 93704.2225

Attorneys for Defendant
PACIFIC PERSONNEL SERVICES,
INC.

14 ☐ **BY MAIL (CCP §1013(a) and CCP §2015.5):** I am readily familiar with the firm's practice of
15 collection and processing documents for mailing. Under that practice it would be deposited with
16 U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles,
17 California, in the ordinary course of business. I am aware that on motion of the party served,
18 service is presumed invalid if postal cancellation date or postage meter date is more than one day
19 after date of deposit for mailing in affidavit.

20 ☐ **BY FACSIMILE TRANSMISSION (CCP §1013(e)(f) and CCP §2015.5):** I caused such
21 documents to be delivered via facsimile transmittal to the office of the addressee. The
22 transmission(s) reported as complete and without error.

23 ☒ **BY ELECTRONIC MAIL (CCP §1010.6; CCP §1013(g) and CCP §2015.5)**

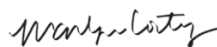
24 ☐ **BY OVERNIGHT DELIVERY (CCP §1013(c)(d) and CCP §2015.5):** I caused such
25 documents to be delivered via express service carrier to the office of the addressee.

26 ☐ **BY PERSONAL SERVICE (CCP §1011 and CCP §2015.5):** I caused such documents to be
27 hand-delivered to the office of the addressee.

28 X State ☐ Federal

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing
is true and correct.

Executed on November 3, 2021, at Los Angeles, California.



Marlyn Cortez

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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1147 South Hope Street, Los Angeles, CA 90015.

On November 30, 2021, I served the foregoing documents described as: **NOTICE OF MOTION FOR APPROVAL OF APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT** on the interested parties in this action by placing a true copy or original thereof enclosed in a sealed envelope, addressed as follows:

California Labor & Workforce
Development Agency
LWDA
800 Capitoll Mall, Suite 5000
Sacramento, California 95814
email@labor.ca.gov

- ☐ **BY MAIL (CCP §1013(a) and CCP §2015.5):** I am readily familiar with the firm's practice of collection and processing documents for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **BY FACSIMILE TRANSMISSION (CCP §1013(e)(f) and CCP §2015.5):** I caused such documents to be delivered via facsimile transmittal to the office of the addressee. The transmission(s) reported as complete and without error.
- X **BY ELECTRONIC MAIL (CCP §1010.6; CCP §1013(g) and CCP §2015.5)**
- ☐ **BY OVERNIGHT DELIVERY (CCP §1013(c)(d) and CCP §2015.5):** I caused such documents to be delivered via express service carrier to the office of the addressee.
- ☐ **BY PERSONAL SERVICE (CCP §1011 and CCP §2015.5):** I caused such documents to be hand-delivered to the office of the addressee.

X State ☐ Federal

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed on November 30, 2021, at Los Angeles, California.



Marlyn Cortez