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10 Attorneys for Plaintiff
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12 **CALIFORNIA SUPERIOR COURT**
13 **IN AND FOR THE COUNTY OF SANTA CRUZ**

14 MARIO ALBERTO GARCIA
15 SAUCEDO,

16 PLAINTIFF,

17 V.

18 CORWIN & VOSKOBOYNIKOV
19 MANAGEMENT, LLC; DANIEL
20 VOSKOBOYNIKOV, AND DOES 1
21 THROUGH 50.

22 DEFENDANTS.

Case No. 20CV02190

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION SEEKING COURT APPROVAL OF
PAGA SETTLEMENT**

Hearing Date: January 26, 2022

Time: 8:30am

Location: Department 10

23 TO ALL PARTIES WHO HAVE MADE AN APPEARANCE IN THIS ACTION:

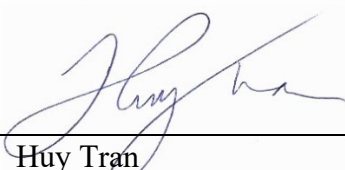
24 PLEASE TAKE NOTICE that on January 26, 2022 at 8:30am in Department 10 at the Santa
25 Cruz County Superior Court, Plaintiff MARIO ALBERTO GARCIA SUACEDO will and hereby does
26 move for an Order pursuant to Labor Code section 2699(1)(2) approving penalties sought as part of a
27 settlement pursuant to Labor Code section 2698, et seq. (the Private Attorneys General Act of 2004
28 "PAGA"). Specifically, Plaintiff will move for an Order approving the distribution of the Settlement,
including amounts to Plaintiff in settlement of his individual claim and the amount of the Settlement
allocated to the PAGA workforce and the California Labor & Workforce Development Agency

1 (“LWDA”); amount to paid to the Settlement Administrator; and an amount to be paid to Plaintiff’s
2 Counsel for their reasonable attorneys’ fees and litigation costs.

3 This Motion is based upon this Notice of Motion and Motion, the Memorandum of Points and
4 Authorities in support thereof, the Declaration of Huy Tran and the exhibits attached thereto, the
5 Declaration of Plaintiff, and any additional papers or arguments submitted on or before the hearing of
6 the Motion.
7

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9 Dated: December 29, 2021

By: _____


Huy Tran
Plaintiff’s Counsel