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8 ATTORNEYS FOR PLAINTIFF DANA LIPKEN

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN JOAQUIN COUNTY**
11 **(UNLIMITED JURISDICTION)**

12 DANA LIPKEN,

13 PLAINTIFF,

14 V.

15 REYNOLDS PACKING CO., A
16 CALIFORNIA CORPORATION, AND DOES 1
THROUGH 10,

17 DEFENDANTS.

) CASE No. STK-CV-UWT-2020-0005673

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

) DATE:

) TIME:

) DEPT: 10C

) JUDGE: Hon. Jayne C. Lee

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on _____ 2021 at _____

3 a.m., Plaintiff Dana Lipken ("Lipken" or "Plaintiff") will move this Court in Department
4 10C thereof, located at 180 E. Weber Avenue, Stockton, CA 95202, for approval of the
5 Private Attorneys General Act ("PAGA") settlement reached in this case, pursuant to
6 Labor Code § 2699(1)(2). Specifically, Lipken moves the Court to approve the settlement
7 to resolve all PAGA claims in the Complaint, to be distributed as follows: (1) \$28,152.90
8 to the State of California and PAGA Affected Employees (75% to the State of California
9 and 25% to PAGA Affected Employees), and (2) \$16,847.10 to Plaintiff's counsel for
10 attorney's fees and costs related to the PAGA settlement. Plaintiff's motion is
11 unopposed.

12 The PAGA settlement is fair, adequate and reasonable. As set forth more fully in
13 the accompanying Memorandum of Points and Authorities, there were risks that the
14 PAGA penalties would be substantially reduced or not awarded because Defendant
15 asserted its occasional inclusion of the full social security numbers on wage statements
16 was a mistake and inadvertent.

17 This motion is based upon this notice of motion and motion, the memorandum of
18 points and authorities, the declaration of Kevin F. Woodall and Defendant, and all other
19 documents and records on file in this action.

20
21 DATE: FEBRUARY 10, 2021

WOODALL LAW OFFICES

22
23 BY: 

24 KEVIN F. WOODALL
25 ATTORNEYS FOR PLAINTIFF, DANA LIPKEN
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