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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
VAN NUYS COURTHOUSE EAST**

KIM D. GARCIA, individually and as
representative of the State of California on
behalf of herself and all aggrieved employees,

Plaintiff,

v.

GOOD KNIGHT INN, CORPORATION, a
California corporation, DIPANKAR ROY, an
individual, and DOES 1 through 20, inclusive,

Defendants.

Case No. 20VECV00968

**NOTICE OF PLAINTIFF'S EX PARTE
APPLICATION AND PLAINTIFF'S EX
PARTE APPLICATION FOR AN ORDER
(1) APPROVING THE SETTLEMENT OF
PLAINTIFF'S PAGA CLAIMS AGAINST
THE DEFENDANTS AND (2)
DISMISSING THOSE PAGA CLAIMS
WITH PREJUDICE; MEMORANDUM
OF POINTS AND AUTHORITIES IN
SUPPORT OF PLAINTIFF'S EX PARTE
APPLICATION (filed under separate cover);
DECLARATION OF DANIEL V.
SANTIAGO IN SUPPORT OF
PLAINTIFF'S EX PARTE
APPLICATION (filed under separate cover);
and [PROPOSED] ORDER GRANTING
PLAINTIFF'S EX PARTE
APPLICATION (filed under separate cover).**

Judge: The Honorable Valerie Salkin

Department: U

Complaint Filed: August 31, 2020

TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that the Plaintiff, Kim D. Garcia, by and through her
undersigned counsel, will appear on February 9, 2022, at 8:30 a.m. before the Honorable Judge
Valerie Salkin in Department U of the Superior Court of California, County of Los Angeles, Van

1 Nuys Courthouse East, located at 6230 Sylmar Ave., Van Nuys, California 91401, on her Ex Parte
2 Application for an Order: approving the settlement of her individual PAGA claims against the
3 Defendants, Good Knight Inn, Corporation, and Dipankar Roy; dismissing Plaintiff's individual
4 PAGA claims against the Defendants *with* prejudice; and dismissing Plaintiff's PAGA claims
5 against the Defendants on behalf of other aggrieved employees *without* prejudice.

6 **PLEASE TAKE FURTHER NOTICE** that this Ex Parte Application is supported by, *inter*
7 *alia*: (1) the Memorandum of Points and Authorities filed concurrently herewith under separate
8 cover; (2) the Declaration of Daniel V. Santiago filed concurrently herewith under separate cover;
9 (3) the [Proposed] Order filed concurrently herewith under separate cover; and (4) any additional
10 information provided and/or arguments made at the hearing on this Ex Parte Application.

11 Dated: February 2, 2022

LAW OFFICES OF DANIEL V. SANTIAGO, P.C.

12 By:



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