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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
POMONA COURTHOUSE SOUTH**

GINA T. DELGADO, individually and as
representative of the State of California on
behalf of herself and all aggrieved employees,

Plaintiff,

v.

NG-27 PATAN, INC., a California corporation,
GOVIND BHAI PRAJAPATI, an individual,
and DOES 1 through 20, inclusive,

Defendants.

Case No. 20PSCV00572

**NOTICE OF PLAINTIFF'S EX PARTE
APPLICATION AND PLAINTIFF'S EX
PARTE APPLICATION FOR AN ORDER
(1) APPROVING THE SETTLEMENT OF
PLAINTIFF'S INDIVIDUAL 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: Honorable Gloria White-Brown

Department: J

Complaint Filed: August 28, 2020

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

PLEASE TAKE NOTICE that the Plaintiff, Gina T. Delgado, by and through her
undersigned counsel, will appear on Monday, November 2, 2020, at 9:00 a.m. before the Honorable

1 Judge Gloria White-Brown in Department J of the Superior Court of California, County of Los
2 Angeles, Pomona Courthouse South, located at 400 Civic Center Plaza, Pomona, California 91766,
3 on her Ex Parte Application for an Order: approving the settlement of her individual claims against
4 the Defendants, NG-27 Patan, Inc. and Govind Bhai Prajapati, under the Private Attorneys General
5 Act of 2004 ("PAGA"), California Labor Code §2698 et seq.; dismissing Plaintiff's individual
6 PAGA claims against the Defendants with prejudice; and dismissing Plaintiff's PAGA claims
7 against the Defendants on behalf of other aggrieved employees without prejudice.

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

13 Dated: October 22, 2020

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

14 By:



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