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Attorneys for Plaintiff MOHAMMAD ALAVICHEH

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

MOHAMMAD ALAVICHEH; an individual,
on behalf of himself and on behalf of other
Aggrieved Employees and the State of
California,

Plaintiff,

v.

SUBURBAN BUICK GMC CADILLAC,
LLC., a Michigan Limited Liability Company;
and DOES 1-50, Inclusive,

Defendant.

Case No: 30-2021-01181315-CU-OE-CXC

**NOTICE OF MOTION FOR
APPROVAL OF PAGA
SETTLEMENT**

Hearing Date: September 2, 2022
Hearing Time: 1:30 p.m.

Honorable Judge Glenda Sanders
Department CX101

Trial Date: Not Set
Action Filed: January 27, 2021

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

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on September 2, 2022, or as soon
3 thereafter as the matter can be heard, in Department CX101 of the above-entitled Court, before the
4 Honorable Judge Glenda Sanders, Plaintiff MOHAMMAD ALAVICHEH ("Plaintiff") will apply
5 for an order approving the PAGA settlement in accordance with Labor Code §2699(1). The
6 proposed settlement is set forth in the accompanying Private Attorney General Act (Labor Code
7 Section 2698 *et seq.*) Settlement Agreement and Limited Release (the "Agreement").

8 This motion will be based on this notice of motion and motion, the accompanying points
9 and authorities, the Declaration of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the
10 Agreement between the parties, and the complete files and records in this action. All parties have
11 approved the Agreement and have met and conferred regarding the motion; therefore, this motion
12 is not opposed by Defendants. The Labor Workforce Development Agency has been served with
13 this motion and the Agreement as set forth in the accompanying proof of service. As this Motion
14 is unopposed, the Parties respectfully request relief from the page limit requirement set by
15 California Rules of Court, Rule 3.1113(d).

16 DATED: August 8, 2022

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18 By: _____

Jean-Claude Lapuyade, Esq.
Attorneys for Plaintiff