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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO

SEYED RAMIN ASBAGHI, individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

PUTNAM CHEVROLET CADILLAC, INC., a
California corporation; PUTNAM
CHEVROLET CADILLAC, LLC, a California
limited liability company; PUTNAM GM, an
unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 21-CIV-04343

Honorable Jeffrey R. Finigan
Department 24

PROOF OF SERVICE

Complaint Filed: August 12, 2021
Trial Date: None Set

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 450 North Brand Blvd., Suite 900, Glendale, California 91203.

On July 17, 2025, I served the foregoing document(s) described as:

- **PLAINTIFF'S NOTICE OF MOTION AND RENEWED MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT (CAL. LABOR CODE § 2698, *ET SEQ.*) SETTLEMENT AGREEMENT AND AWARD OF ATTORNEYS' FEES AND COSTS, GENERAL RELEASE FEE, AND SETTLEMENT ADMINISTRATION COSTS; MEMORANDUM OF POINTS AND AUTHORITIES**
- **DECLARATION OF VARTAN MADROYAN IN SUPPORT OF PLAINTIFF'S NOTICE OF RENEWED MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT AGREEMENT AND AWARD OF ATTORNEYS' FEES AND COSTS, GENERAL RELEASE FEE, AND SETTLEMENT ADMINISTRATION COSTS**
- **DECLARATION OF SEYED RAMIN ASBAGHI IN SUPPORT OF PLAINTIFF'S RENEWED MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT (CAL. LABOR CODE § 2698, *ET SEQ.*) SETTLEMENT AGREEMENT**
- **DECLARATION OF SIMPLURIS INC. (DENISE ISLAS) IN SUPPORT OF PLAINTIFF'S NOTICE OF RENEWED MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT AGREEMENT AND AWARD OF ATTORNEYS' FEES AND COSTS, GENERAL RELEASE FEE, AND SETTLEMENT ADMINISTRATION COSTS**
- **[PROPOSED] ORDER AND JUDGMENT GRANTING APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT (CAL. LABOR CODE § 2698, *ET SEQ.*) SETTLEMENT AGREEMENT**
- **PROOF OF SERVICE**

on interested parties in this action as follows:

Daniel J. Padova

Dave Reese

John Boggs

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Attorneys for Defendants Putnam Chevrolet Cadillac, Inc., et al.

1 **[X] BY E-MAIL**

2 The above-referenced document(s) was transmitted to the person(s) at the e-mail
3 address(es) listed herein at their most recent known e-mail address or e-mail of record in
4 this action. I did not receive, within reasonable time after the transmission, any
5 electronic message or other indication that the transmission was unsuccessful.

6 State of California, Labor & Workforce Development Agency

7 Web URL:

8 <http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

9 **[X] BY ONLINE SUBMISSION**

10 The foregoing documents were transmitted to the California Labor and Workforce
11 Development Agency through the online system established for the submission of notices
12 and documents, in conformity with California Labor Code section 2699(l). I did not
13 receive, within a reasonable time after the transmission, any electronic message or other
14 indication that the transmission was unsuccessful.

15 **[X] STATE**

16 I declare under penalty of perjury under the laws of the State of California that the above
17 is true and correct.

18 Executed on July 17, 2025, at Glendale, California.

19 

20 Bianca Balentine